

Public Meeting Transcripts, Slides, and Hand-outs

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NHTSA Docket No. 2001-8677

On June 18th and 19th, the National Highway Traffic Safety Administration (NHTSA) held a total of four public meetings with various representatives of the motor vehicle industry to a) review the requirements of Early Warning Reporting, b) discuss recent changes, c) and to answer questions.

Attached are transcripts, slides, and hand-outs for the four meetings. The first meeting was for the tire industry, the second was for child seats and equipment, the third for light vehicles, and the fourth for all remaining vehicles.

While the information provided was true and accurate at the time of the meeting, policies and procedures change. The reader is encouraged to review the most recent publications after June 19, 2003, especially those published on the NHTSA's web site, for the most up-to-date information.

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Early Warning Reporting Contact and Information Resources

		<i>Phone</i>	<i>Fax</i>	<i>E-Mail</i>
General Assistance	Office of Defects Investigation	202-366-0699	202-366-7882	ewrhelp@nhtsa.dot.gov
Legal Issues	Office of Chief Counsel	202-366-5263		
Email EWR Submissions	Office of Defects Investigation	202-366-0699	N.A.	odi.ewr@nhtsa.dot.gov
External Communications & TSBs	Office of Defects Investigation	202-366-0699	N.A.	tsb@nhtsa.dot.gov
Foreign Recalls and Substantially Similar Vehicle Listing	Office of Defects Investigation	202-366-0699	N.A.	frecalls@nhtsa.dot.gov
Assistance with Electronic Submissions to Artemis	Artemis Help Desk	617- 374-2776	N.A.	artemishelpdesk@volpe.dot.gov



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The final rule for EWR was published on July 10, 2002 (see 67 Federal Register 45822) and became effective on August 9, 2002. It is set forth at 49 CFR Part 579, "Reporting of Information and Communications About Potential Defects". Part 579 is divided into three subparts-

Subpart A, "General"

Subpart B, "Reporting of Information About Foreign Safety Recalls and Campaigns Related to Potential Defects"

Subpart C, "Reporting on Early Warning Information"

Subpart "A" sets forth the purpose, scope and applicability of the regulation. This subpart also provides definitions of terms used in the regulation and provides direction on the submission of certain notices, bulletins and other communications that manufacturers must forward to NHTSA.

Subpart "B" sets forth the requirements for reporting on foreign safety recalls and other safety campaigns conducted in foreign countries that involve identical or substantially similar vehicles or items of equipment to that available in the United States. This subpart requires vehicle manufacturers to provide NHTSA with an annual list of vehicles produced in foreign countries that are substantially similar to those offered for sale in the United States.

Subpart "C" sets forth the EWR requirements and specifies how information is to be submitted.

Since the publication of the final rule, NHTSA has issued three notices in response to petitions for reconsideration or questions seeking clarification. The two most recent notices (identified as Notice 5 and Notice 6) were published in the Federal Register June 11, 2003. The information presented in these notices is summarized below.

Notice 5

- Clarifies questions related to record retention
- Clarifies questions related to production number reporting
- Clarifies or defines certain terminology – *Control, Base, Buckle, Claim, Field Report, Fire, Handle, Minimal Specificity (related to tires), Model (related to child restraints), Model Year, Service Brake System, Tire and Warranty Claim.*
- Clarifies the "type" and "model year" concerns with regard to child restraint system reporting
- Clarifies when property damage claims need not be reported
- Clarifies the reporting threshold for tire manufacturers
- Clarifies submission due dates



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- Allows for the submission of cover sheets to allow manufacturers the opportunity to explain or clarify data being submitted
- Allows manufacturers to assign a unique alphanumeric code to any reported death/injury incident to assist with identifying particular records
- Clarifies how copies of non-dealer field reports are to be arranged for submission
- Establishes a vehicle “type” category for production reporting by Medium-Heavy Vehicle/Bus and Trailer manufacturers
- Allows for the use of the two-character DOT alphanumeric code to identify domestic production plants for reporting

Notice 6

- Defers initial reporting of safety-related campaigns referred to in Part 579.5(d) to July 1st, 2003.
- Defers the initial reporting period and submission due dates for EWR data, historical data and field report copies
- Establishes a due date for the submission of copies of non-dealer field reports

EWR reporting is deferred one quarter. The initial report covering the 3rd quarter of 2003 (July – September) is due by December 1, 2003.

One-time historical data is deferred one quarter. This report will cover the twelve quarters between July 1, 2000 and March 31, 2003. This submission is due by December 31, 2003.

Copies of non-dealer field reports will be due 30 days after the due date for EWR data. The initial reporting period is deferred until the 1st quarter of 2004. Submission of these reports is due by July 01, 2004.



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Document or Data Submission Type	Due Date	Notations
Foreign Safety Recall and Campaign Reporting	5 working days of a determination or order to conduct a safety recall or campaign	Daily Identical or substantially similar vehicles
External Communications	5 days of the month's end in which the communication was issued	Monthly
Substantially Similar Vehicle List	November 1 each year	Annually
EWR Aggregate Data	30 days of end of reporting quarter	3 rd Quarter 2003 due 12/01/03 (60 days) 4 th Quarter 2003 due 03/01/04 (60 days) 1 st Quarter 2004 due 06/01/04 (60 days) 2 nd Quarter 2004 due 07/30/04 (30 days)
Death/Injury Report	30 days of end of reporting quarter AND following submission of the EWR data	For manufacturers required to submit EWR data, Death/Injury reporting must be submitted after EWR quarterly data has been submitted.
Field Reports	30 days following the due date for quarterly aggregate reporting	First reporting quarter is January-March 2004 which is due 07/01/04
Historical Data (One Time Reporting)	December 31, 2003	Covers manufacturers reporting under §579.21 - .26 Includes 12 quarterly reports: July – September 2000 October – December 2000 January – March 2001 April – June 2001 July – September 2001 October – December 2001 January – March 2002 April – June 2002 July – September 2002 October – December 2002 January – March 2003 April – June 2003



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“Substantially Similar Defined” §579.4(d)

A motor vehicle sold or in use outside the United States is identical or substantially similar to a motor vehicle sold or offered for sale in the United States if--

- Motor Vehicle:
- (i) Such a vehicle has been sold in Canada or has been certified as complying with the Canadian Motor Vehicle Safety Standards;
 - (ii) Such a vehicle is listed in the VSP or VSA columns of Appendix A to part 593 of this chapter;
 - (iii) Such a vehicle is manufactured in the United States for sale in a foreign country; or
 - (iv) Such a vehicle uses the same vehicle platform as a vehicle sold or offered for sale in the United States.
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Equipment:

An item of motor vehicle equipment sold or in use outside the United States is identical or substantially similar to equipment sold or offered for sale in the United States if such equipment and the equipment sold or offered for sale in the United States have one or more components or systems that are the same, and the component or system performs the same function in vehicles or equipment sold or offered for sale in the United States, regardless of whether the part numbers are identical.

Tire:

A tire sold or in use outside the United States is substantially similar to a tire sold or offered for sale in the United States if it has the same size, speed rating, load index, load range, number of plies and belts, and similar ply and belt construction and materials, placement of components, and component materials, irrespective of plant of manufacture or tire line.



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Overview of quarterly reporting responsibilities for manufacturers of motor vehicles having an annual production of 500 or more vehicles.

Regulatory Requirement	Required Submission	Manufacturers of Light Vehicles >500 annually (section 579.21)	Manufacturers of Medium-Heavy Vehicle/Bus >500 annually (Section 579.22)	Manufacturers of Trailers >500 annually (Section 579.23)	Manufacturers of Motorcycles >500 annually (Section 579.24)
579.5	Copies of External Communications	Due within 5 days of the end of the month in which the communication is sent			
579.11--12	Foreign Recalls & Other Safety Campaigns	Due within 5 days of the decision or Order to initiate the foreign recall; "Substantially Similar Vehicle" listing due November 1 st of each year			
579.21—24 Paragraph a	Production	<u>Current</u> production as of the end of reporting quarter and total production for 2 previous model years. Due within 30 days of the end of the calendar reporting quarter (60 Days for 2003 and 1 st Quarter 2004 Reports).			
579.21—24 Paragraph b	Fatality Claims and Notices	Notice or Claims received during the quarter on <u>current</u> production and the preceding 2 model years of production. Due within 30 days of the end of the calendar reporting quarter (60 Days for 2003 and 1 st Quarter 2004 Reports).			
	Injury Claims and Notices				
579.21—24 Paragraph c	Number of Property Damage Claims	Claims received during the quarter on <u>current</u> production and the preceding 2 model years. Due within 30 days of the end of the calendar reporting quarter (60 Days for 2003 and 1 st Quarter 2004 Reports).			
	Numbers of Consumer Complaints				
	Number of Warranty Claims				
579.21—24 Paragraph c	Number of Field Reports	Dealer, fleet and field reports received during the quarter on <u>current</u> production and the preceding 2 model years. Due within 30 days of the end of the calendar reporting quarter (60 Days for 2003 and 1 st Quarter 2004 Reports).			
579.21—24 Paragraph d	Copies of Non-Dealer Field Reports	A copy of each field report issued during quarter on current production and preceding 9 model years. Due within 30 days after the submission of the aggregate quarterly report (1 st submission is for the 1 st quarter 2004 and due by 07/01/04).			



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Overview of early warning reporting by manufacturer type.

Manufacturer Type								
Applicable Regulation	Light Vehicle – 500 or more Annually	Medium/Heavy Vehicle & Bus – 500 or more Annually	Motorcycle – 500 or more Annually	Trailer – 500 or more Annually	Child Restraint Systems	Tires	Other Original or Replacement Motor Vehicle Equipment	Vehicle Manufacturers Producing Fewer Than 500 Annually
External Communications	●	●	●	●	●	●	●	●
Foreign Recalls/Campaigns ¹	●	●	●	●	●	●	●	●
Production	●	●	●	●	●	●		
Fatality Claims and Notices	●	●	●	●	●	●	●	●
Injury Claims and Notices	●	●	●	●	●	●		
Numbers of Property Damage Claims	●	●	●	●		●		
Numbers of Consumer Complaints	●	●	●	●	●			
Numbers of Warranty Claims	●	●	●	●	●	●		
Numbers of Field Reports	●	●	●	●	●			
Copies of Non-Dealer Field Report	●	●	●	●	●			

¹ Vehicle manufacturers reporting per §579.21-.24 must also submit a list of “identical and substantially similar vehicles” by November 1 of each year.



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Vehicle Type Codes For Use
On Manufacturer Production Aggregate Worksheet

Vehicle Reporting Category	Vehicle Type	Reporting Code
Light Vehicle (L)	Passenger Car	PC
	Light Truck	TK
	Multipurpose Passenger Vehicle	MT
	Incomplete Chassis	IC
Medium-Heavy Vehicle and Bus (H)	Truck	TK
	Tractor	TT
	Transit Bus	TB
	School Bus	SB
	Coach	CO
	Recreational Vehicle	RV
	Emergency Vehicle	EV
	Other	OT
Trailer (Y)	Recreational Trailer	RT
	Van Trailer	VT
	Flatbed Trailer	FT
	Converter Dolly Trailer	CD
	Lowbed Trailer	LB
	Dump Trailer	DT
	Tank Trailer	TT
	Dry Bulk Trailer	DB
	Livestock Trailer	LT
	Boat Trailer	BT
	Auto Transporter	AT
	Other	OT
Motorcycle (M)	Not Applicable	



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Additional Fuel and Brake System Codes for Medium-Heavy
Truck and Bus Manufacturer Production Data Worksheet

System Identification		Code
Fuel System Type Codes	Gasoline	G
	Diesel	D
	Other	O
Brake System Codes ¹	Air (Pneumatic) Brake System	A
	Hydraulic Brake System	H
	None	N

Additional Brake System Codes for Trailer Manufacturer
Production Data Worksheet

System Identification		Code
Brake System Codes ¹	Air (Pneumatic) Brake System	A
	Hydraulic Brake System	H
	None	N

¹ Systems other than Air (Pneumatic) or Hydraulic should be scored against the “Hydraulic” entry. Air over hydraulic type systems should, however, be scored against “Air”.



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System/Component Codes Defined By Vehicle Reporting
Category – Aggregate Data and Death/Injury Worksheets

Light Vehicles

Component Code	Description	Component Code	Description
01	Steering System	14	Airbags
02	Suspension System	15	Seat Belts
03	Service Brake System	16	Structure
05	Parking Brake System	17	Latch
06	Engine and Cooling System	18	Vehicle Speed Control
07	Fuel System	19	Tires
10	Power Train	20	Wheels
11	Electrical System	22	Seats
12	Exterior Lighting	23	Fire
13	Visibility	24	Rollover
		Death/Injury Report Only	
		98	System/Component Not Covered Above
		99	No System/Component Specified

Note: 18 system/component codes, plus code for fire and rollover (secondary events).
Code 98 is used when system/component is not covered by the reporting category
Code 99 is used when system/Component is not specified in the claim or notice related to a death or injury.

Motorcycles

Component Code	Description	Component Code	Description
01	Steering System	12	Exterior Lighting
02	Suspension System	16	Structure
03	Service Brake System	18	Vehicle Speed Control
06	Engine and Cooling System	19	Tires
07	Fuel System	20	Wheels
10	Power Train	23	Fire
		Death-Injury Claim Only	
		98	System/Component Not Covered Above
		99	No System/Component Specified

Note: 11 system/component codes, plus code for fire (secondary event).
Rollover is NOT a reportable category for motorcycles.
Code 98 is used when system/component is not covered by the reporting category
Code 99 is used when system/Component is not specified in the claim or notice related to a death or injury.



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Medium-Heavy Vehicles and Buses

Component Code	Description	Component Code	Description
01	Steering System	13	Visibility
02	Suspension System	14	Airbags
03	Service Brake System, Hydraulic	15	Seat Belts
04	Service Brake System, Air	16	Structure
05	Parking Brake	17	Latch
06	Engine and Cooling System	18	Vehicle Speed Control
07	Fuel System, Gasoline	19	Tires
08	Fuel System, Diesel	20	Wheels
09	Fuel System, Other	21	Trailer Hitch
10	Power Train	22	Seats
11	Electrical	23	Fire
12	Exterior Lighting	24	Rollover
		Death/Injury Report Only	
		98	System/Component Not Covered Above
		99	No System/Component Specified

Note: 22 system/component codes, plus code for fire and rollover (secondary events).
Code 98 is used when system/component is not covered by the reporting category
Code 99 is used when system/Component is not specified in the claim or notice related to a death or injury.

Trailers

Component Code	Description	Component Code	Description
02	Suspension System	16	Structure
03	Service Brake System, Hydraulic	17	Latch
04	Service Brake System, Air	19	Tires
05	Parking Brake	20	Wheels
11	Electrical System	21	Trailer Hitch
12	Exterior Lighting	23	Fire
		Death-Injury Reports Only	
		98	System/Component Not Covered Above
		99	No System/Component Specified

Note: 11 system/component codes, plus code for fire (secondary event).
Rollover is NOT a reportable category for trailers.
Electric service brake systems should be scored against hydraulic service brake system
Code 98 is used when system/component is not covered by the reporting category
Code 99 is used when system/Component is not specified in the claim or notice related to a death or injury.



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Overview of quarterly reporting responsibilities for manufacturers child restraint systems.

Regulatory Requirement	Required Submission	Description
579.5	Copies of External Communications	Due within 5 days of the end of the month in which the communication is sent
579.11--12	Foreign Recalls & Other Safety Campaigns	Due within 5 days of the decision or Order to initiate the foreign recall
579.25 paragraph a	Production	<u>Current</u> production as of the end of reporting quarter and total production for <u>4</u> previous model/production years. Due within 30 days of the end of the calendar reporting quarter (60 Days for 2003 and 1 st Quarter 2004 Reports).
579.25 Paragraph b	Fatality Claims and Notices	Notice or Claims received during the quarter on <u>current</u> production and the preceding <u>4</u> model/production years of production. Due within 30 days of the end of the calendar reporting quarter (60 Days for 2003 and 1 st Quarter 2004 Reports).
	Injury Claims and Notices	
579.25 Paragraph c	Numbers of Consumer Complaints and Warranty Claims	Complaints/claims received during the quarter on <u>current</u> production and the preceding <u>4</u> model/production years. Due within 30 days of the end of the calendar reporting quarter (60 Days for 2003 and 1 st Quarter 2004 Reports).
579.25 Paragraph c	Number of Field Reports	Dealer, fleet and field reports received during the quarter on <u>current</u> production and the preceding 4 model/production years. Due within 30 days of the end of the calendar reporting quarter (60 Days for 2003 and 1 st Quarter 2004 Reports).
579.25 Paragraph d	Copies of Non-Dealer Field Reports	A copy of each field report issued during quarter on current production and preceding 4 model/production years. Due within 30 days after the submission of the aggregate quarterly report (1 st submission to include 1 st quarter 2004, due 06/30/04).



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Overview of early warning reporting by manufacturer type.

Manufacturer Type								
Applicable Regulation	Light Vehicle – 500 or more Annually	Medium/Heavy Vehicle & Bus – 500 or more Annually	Motorcycle – 500 or more Annually	Trailer – 500 or more Annually	Child Restraint Systems	Tires	Other Original or Replacement Motor Vehicle Equipment	Vehicle Manufacturers Producing Fewer Than 500 Annually
External Communications	●	●	●	●	●	●	●	●
Foreign Recalls/Campaigns ¹	●	●	●	●	●	●	●	●
Production	●	●	●	●	●	●		
Fatality Claims and Notices	●	●	●	●	●	●	●	●
Injury Claims and Notices	●	●	●	●	●	●		
Numbers of Property Damage Claims	●	●	●	●		●		
Numbers of Consumer Complaints	●	●	●	●	●			
Numbers of Warranty Claims	●	●	●	●	●	●		
Numbers of Field Reports	●	●	●	●	●			
Copies of Non-Dealer Field Report	●	●	●	●	●			

¹ Vehicle manufacturers reporting per §579.21-.24 must also submit a list of “identical and substantially similar vehicles” by November 1 of each year.



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Type Codes For Use
On Manufacturer Production Aggregate Worksheet
(Child Restraint Systems)

Child Restraint System Type	Reporting Code
Rea Facing Infant Seat	RI
Booster Seat	BS
Other	OT

Component Codes

Component Code	Description	Component Code	Description
51	Buckle	53	Handle
52	Seat Shell	54	Base
		Death/Injury Report Only	
		98	System/Component Not Covered Above
		99	No System/Component Specified

Note: 4 system/component codes.
Code 98 is used when system/component is not covered by the reporting category
Code 99 is used when system/Component is not specified in the claim or notice related to a death or injury.



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Overview of quarterly reporting responsibilities for manufacturers of tires.

Regulatory Requirement	Required Submission	Description
579.5	Copies of External Communications	Due within 5 days of the end of the month in which the communication is sent
579.11--12	Foreign Recalls & Other Safety Campaigns	Due within 5 days of the decision or Order to initiate the foreign recall
579.26 Paragraph a	Production	<u>Current</u> production as of the end of reporting quarter and total production for <u>4</u> previous model years. Due within 30 days of the end of the calendar reporting quarter (60 Days for 2003 and 1 st Quarter 2004 Reports).
579.26 Paragraph b	Fatality Claims and Notices	Notice or Claims of fatality or injury received during the quarter on <u>current</u> production and the preceding <u>4</u> model years of production. Due within 30 days of the end of the calendar reporting quarter (60 Days for 2003 and 1 st Quarter 2004 Reports).
	Injury Claims and Notices	
579.26 Paragraph c	Number of Property Damage Claims	Total claims and adjustments received during the quarter on <u>current</u> production and the preceding <u>4</u> model years. Due within 30 days of the end of the calendar reporting quarter (60 Days for 2003 and 1 st Quarter 2004 Reports).
	Number of Warranty Adjustments	
579.26 Paragraph d	Reporting of Common Green	With each quarterly report, the manufacturer will submit a list of common green tires. .



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Overview of early warning reporting by manufacturer type.

Applicable Regulation	Manufacturer Type							
	Light Vehicle – 500 or more Annually	Medium/Heavy Vehicle & Bus – 500 or more Annually	Motorcycle – 500 or more Annually	Trailer – 500 or more Annually	Child Restraint Systems	Tires	Other Original or Replacement Motor Vehicle Equipment	Vehicle Manufacturers Producing Fewer Than 500 Annually
External Communications	●	●	●	●	●	●	●	●
Foreign Recalls/Campaigns ¹	●	●	●	●	●	●	●	●
Production	●	●	●	●	●	●		
Fatality Claims and Notices	●	●	●	●	●	●	●	●
Injury Claims and Notices	●	●	●	●	●	●		
Numbers of Property Damage Claims	●	●	●	●		●		
Numbers of Consumer Complaints	●	●	●	●	●			
Numbers of Warranty Claims	●	●	●	●	●	●		
Numbers of Field Reports	●	●	●	●	●			
Copies of Non-Dealer Field Report	●	●	●	●	●			

¹ Vehicle manufacturers reporting per §579.21-.24 must also submit a list of “identical and substantially similar vehicles” by November 1 of each year.



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File Naming Requirements for Early Warning Reporting
(Aggregate and Death/Injury Submissions)

All EWR and field report files intended for submission must be saved using a specific file naming convention. File names are constructed through a concatenation of a file name identifier, sequence number and file extension that will allow NHTSA to identify the content of the submission. The file name identifier consists of 14 characters that will uniquely identify the reporting manufacturer, reporting period and report type. The sequence number, consisting of five characters, identifies the number of workbooks used for the submission. While the file extension identifies the format in which the data is preserved.

The table below illustrates construction of the file name.

File Name Example: **123456Y033001A00001.xls**

1 2 3 4 5 6	Y	0 3	3	0 0 1	A	0 0 0 0 1	.xls
Manufacturer ID	Report Category	Report Year	Report Quarter	Report Version	Report Type	Sequence Number	File Extension

Character Position	Identifier	Description	Required Number of Characters
1-6	EWR ID	Unique manufacturer ID number with leading "0" if required	6
7	Report Category	C – Child Restraint Systems H – Medium-Heavy Vehicle/Bus L – Light Vehicle Y – Trailer M – Motorcycle T – Tires E – Equipment Z – Below Threshold Vehicles	1
8-9	Report Year	Two-digit calendar year (YY)	2
10	Report Quarter	One-digit report quarter (1-4)	1
11-13	Report Version	Three-digit version number of report. Begins with "001"	3
14	Report Type	A – Aggregate Data D – Death/Injury Data F – Field Report (File naming only)	1
15-19	Sequence Number	Sequence number for the quarter ¹ . Begins with "00001"	5
20-23	File Extension	Format	Acceptable .xls,.xml, zip

¹ Sequence number identifies when multiple workbooks are used to report quarterly submissions



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Field Report Naming Requirements
(Electronic Submission of Non Dealer Field Reports)

All individual field reports are to be identified using a specific file naming convention. All reports for the reporting quarter will be compressed (using a ZIP archive format) and electronically transmitted as a file (using the file naming convention). A field report name may be of variable length, but may not exceed 37 characters. Field report name are derived from a concatenation of the report type, vehicle model or platform, model year range, subject components, sequence number and attachment identifier. Through this naming convention, NHTSA can identify the content of the submission.

Note, all alpha characters are in upper case and the underscore “_” character is used to delimit the attributes of the field report name.

The table below illustrates construction of the field report name.

Field Report Name Example: **SNAME_0102_1011_00001_1.pdf**

S	N A M E _	0 1 0 2 _	1 0 1 1 _	0 0 0 0 1 _	1	.pdf
Application	Model or Platform Name w/Delimiter	Model Year Range (2001 – 2002) w/Delimiter	Subject Component Codes (10/11)	Sequence Number	Attachment Number	Extension

Character Position	Identifier	Description	Required Number of Characters
1	Application	S - Single Model P – Single Platform (Vehicles) M – Multiple Models or Platforms T – Transcription of Field Report	1
2-11	Model or Platform Name	Identifies one model or platform referenced in the field report. Truncation of a name is allowed. No abbreviations or spaces.	Up to 10
Insert Delimiter “_”			
Varies	Model Year Range	Two characters to represent earliest model year model or product year referenced in the report followed by two character year of last model or product year. (“0103” references 2001-2003)	4
Insert Delimiter “_”			
Varies	Component(s)	Two-digit component or system number (from aggregate sheet) that reference the subject of the field report. Up to 5 components may be referenced. Codes “98” and “99” are not permitted.	Up to 10
Insert Delimiter “_”			
Varies	Sequence Number	Sequence Number for the reporting quarter for use in identifying multiple field reports for Model, Platform, Model Year, Components	5

Continued



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Field Report Naming Continued

Insert Delimiter “_” Required only if attachment number is to follow			
Varies	Attachment Number	Numeric value of 1-999 to identify attachments to field reports.	Optional Use Up to 3
	File Extension	Acceptable formats: Adobe PDF - .pdf Tag Image format - .tiff Text - .txt MS Word - .doc Rich Text - .rtf	

Sample Field Report Names

Single Year, Model, Component and no attachments

- SACCORD_0000_07_00001.pdf
Single vehicle, MY 2000 Accord fuel system
- SACCORD_0000_07_00002.pdf
Second Field Report for Single vehicle, MY 2000 Accord fuel system

Single Year, Model and Component with attachments

Field Report Name -STAURUS_9999_03_00001.pdf

- STAURUS_9999_03_00001_1.pdf
First attachment
- STAURUS_9999_03_00001_2.pdf
Second attachment

Multiple Model Years, single Model, single Component, with attachment

- SCAMRY_9902_05_00001.pdf (1999-2002 Camry, Parking Brake)
- SCAMRY_9902_05_00001_1.pdf (attachment to above)

Single Model Year, single Model, multiple Components, with attachment

- SC5500_9999_0305_00001.pdf (1999 C5500, Service Brake and Parking Brake)

Multiple Models (reverts to Platform), multiple Model Years, multiple Components, with attachments

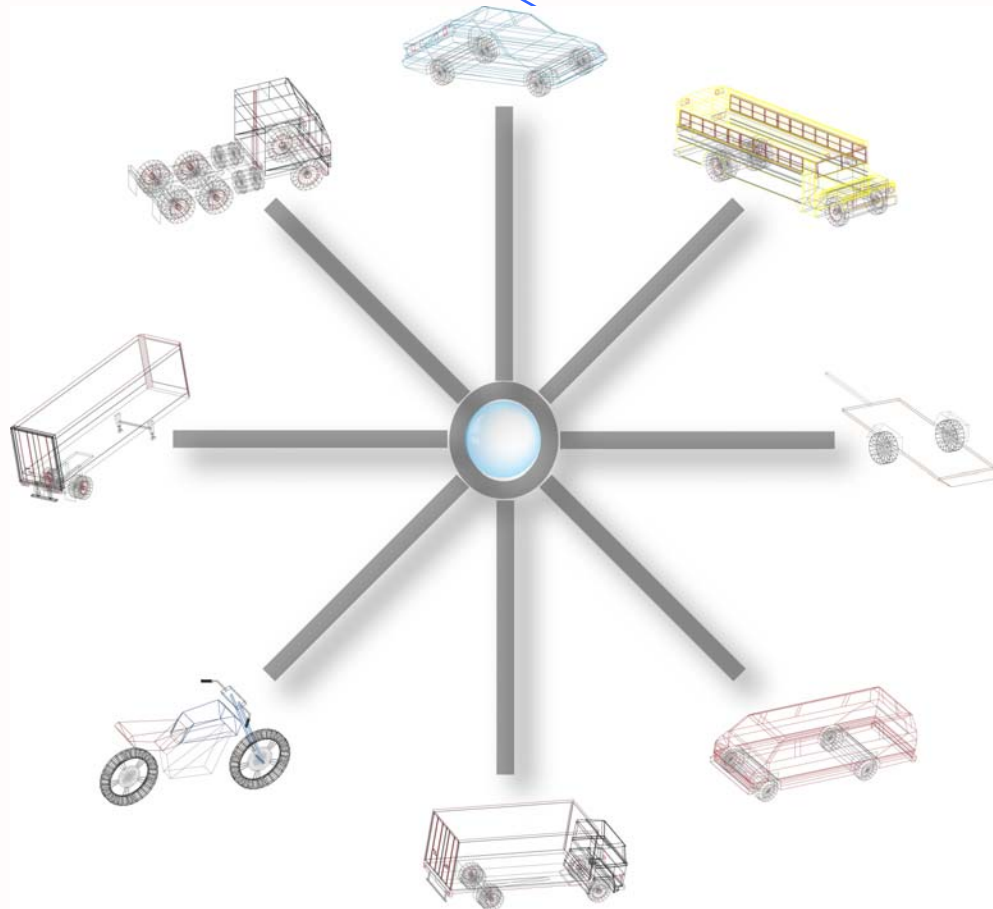
- MDN101_9699_01020305_00001.pdf (1996-1999 DN101 platform, steering, suspension, service brake and parking brake)
- MDN101_9699_01020305_00002.pdf (1996-1999 DN101 platform, steering, suspension, service brake and parking brake – Second Field Report)
- MDN101_9699_01020305_00002_1.pdf (1996-1999 DN101 platform, steering, suspension, service brake and parking brake – Attachment to Second Field Report)

The following are slides from the June 18 and 19, 2003 public meeting PowerPoint presentation. The presentations include Vehicles, Child Safety Systems-Equipment and Tires.

The slides illustrating the file and field report naming conventions are contained within the Vehicle presentation.



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Presented by the Office of Defects Investigation



AGENDA June 19th 2003

Part 579 Requirements

❖ External Communications

❖ Foreign Recall Reporting

Substantially Similar Vehicle Listing



AGENDA June 19th 2003

- ❖ EWR Reporting...
- ❖ Production and Warranty, Property Damage, Consumer Claims, & Field Report Counts
- ❖ Death and Injury Reporting
- ❖ One Time Historical Reporting
- ❖ Field Report Submissions



Agenda (Continued)

Manner of Reporting

- ❖ Manufacturer ID Management
- ❖ Schedule of Reporting
- ❖ Post Data Review
- ❖ Compendium



Manufacturer Type								
Applicable Regulation	Light Vehicle	Medium/ Heavy Vehicle & Bus	Motor-cycle	Trailer	Child Restraint Systems	Tires	Other Motor Vehicle Equip.	Vehicle Mfgs. <500 Annually
External Communications	●	●	●	●	●	●	●	●
Foreign Recalls/Campaigns	●	●	●	●	●	●	●	●
Production	●	●	●	●	●	●		
Fatality Claims and Notices	●	●	●	●	●	●	●	●
Injury Claims and Notices	●	●	●	●	●	●		
Numbers of Property Damage Claims	●	●	●	●		●		
Numbers of Consumer Complaints	●	●	●	●	●			
Numbers of Warranty Claims	●	●	●	●	●	●		
Numbers of Field Reports	●	●	●	●	●			
Copies of Non-Dealer Field Report	●	●	●	●	●			



Overview of reporting responsibilities for manufacturers of all motor vehicles.

Copies of External Communications:

- Due within 5 days of the end of the month in which the communication is sent or made available.
- Campaign-related documents to be submitted beginning July 1, 2003.



Overview of reporting responsibilities for manufacturers of all motor vehicles.

Foreign Recalls & Other Safety Campaigns:

- Due within 5 days of the decision or order to initiate the foreign recall; “Substantially Similar Vehicle” listing due November 1st of each year.



Overview of quarterly reporting responsibilities for manufacturers of motor vehicles having an annual production of 500 or more vehicles.

Production:

Current production as of the end of reporting quarter and total production for **9** previous model years.

- Number of Property Damage Claims
- Number of Consumer Complaints
- Number of Warranty Claims
- Number of Field Reports

Due within 30 days of the end of the calendar reporting quarter.



Overview of quarterly reporting responsibilities for manufacturers of motor vehicles having an annual production of 500 or more vehicles.

- Fatality Claims and Notices
- Injury Claims and Notices
- Notice or Claims received during the quarter on current production and the preceding 9 model years of production.
- Submitting along with or after Production and Aggregate Counts Data



Microsoft Excel - LightVehicles.xls

File Edit View Insert Format Tools Data Window Help

A20

	A	B	C	D	E	F	G	H	I	J	K
1	InfoName	InfoValue									
2	ManufacturerName										
3	ReportQuarter										
4	ReportYear										
5	ReportName	LightVehicles									
6	ReportVersion										
7	ReportGeneratedDate										
8	ReportContactName										
9	ReportContactEmail										
10	ReportContactPhone										
11	NHTSATemplateRevisionNo	1.2									
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ReportInfo Production ConsumerComplaints PropertyDamage WarrantyClaims FieldReports

Ready

← Manufacturer Type

← Manufacturer Contact Info.

Aggregate Data
Page One



Microsoft Excel - BMHVehicles.xls

File Edit View Insert Format Tools Data Window Help

B2 =

1	InfoName	InfoValue	C	D	E	F	G	H	I	J	K
2	ManufacturerName										
3	ReportQuarter										
4	ReportYear										
5	ReportName	BusesAndMediumHeavyVehicles									
6	ReportVersion										
7	ReportGeneratedDate										
8	ReportContactName										
9	ReportContactEmail										
10	ReportContactPhone										
11	NHTSATemplateRevisionNo	1.2									
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Sample Page One for
Medium-Heavy Truck and Bus

Aggregate Worksheets

ReportInfo Production ConsumerComplaints PropertyDamage WarrantyClaims FieldReports



Microsoft Excel - LightVehicles.xls

File Edit View Insert Format Tools Data Window Help

A3 =

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
	Make	Model	ModelYear	Type	Platform	TotalProduction								
1														
2														
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ReportInfo Production ConsumerComplaints PropertyDamage WarrantyClaims FieldReports

Ready

Light Vehicle Production
Aggregate



Microsoft Excel - BMHVehicles.xls

File Edit View Insert Format Tools Data Window Help

A2 =

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
	Make	Model	ModelYear	Type	FuelSystem	BrakeSystem	TotalProduction							
1														
2														
3														
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ReportInfo Production ConsumerComplaints PropertyDamage WarrantyClaims FieldReports

Ready

Medium-Heavy
Vehicle and Bus
Production
Template



Microsoft Excel - Trailers.xls

File Edit View Insert Format Tools Data Window Help

A4

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
	Make	Model	ModelYear	Type	BrakeSystem	TotalProduction								
1														
2														
3														
4														
5														
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ReportInfo Production ConsumerComplaints PropertyDamage WarrantyClaims FieldReports

Ready

Trailer
Production
Template



Microsoft Excel - BMHvehicles.xls

File Edit View Insert Format Tools Data Window Help

100%

O19

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC
	Make	Model	ModelYear	Steering-01	Suspension-02	ServiceBrake-03	ServiceBrakeAir-04	ParkingBrake-05	EngAndEngCooling-06	FuelSys-07	FuelSysDiesel-08	FuelSysOther-09	PowerTrain-10	Electrical-11	ExtLighting-12	Visibility-13	AirBags-14	SeatBelts-15	Structure-16	Latch-17	SpeedControl-18	TiresRelated-19	Wheels-20	TrailerHitch-21	Seats-22	FireRelated-23	Rollover-24		
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ReportInfo Production ConsumerComplaints PropertyDamage WarrantyClaims FieldReports

Ready

System / Component Codes (Will vary by manufacturer)

MMMY Entry

Sample Aggregate Worksheet



Microsoft Excel - BMHVehiclesDI.xls

File Edit View Insert Format Tools Data Window Help

100%

	A	B	C	D	E	F	G	H	I	J
1	InfoName	InfoValue								
2	ManufacturerName									
3	ReportQuarter									
4	ReportYear									
5	ReportName	BusesAndMediumHeavyVehiclesDI								
6	ReportVersion									
7	ReportGeneratedDate									
8	ReportContactName									
9	ReportContactEmail									
10	ReportContactPhone									
11	NHTSATemplateRevisionNo	1.2								
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ReportInfo DeathsInjuries

Ready

Death / Injury
Template
Information Page



Microsoft Excel - BMHVehiclesDi.xls

File Edit View Insert Format Tools Data Window Help

A2

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
	ID	ManUniqueID	Make	Model	ModelYear	VIN	IncidentDate	NumDeaths	NumInjuries	StateOrFCntry	SysOrCompA	SysOrCompB	SysOrCompC	SysOrCompD	SysOrCompE
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ReportInfo DeathsInjuries

Ready

Minimal Specificity, U.S. Product

2-Digit System/Component Codes

Sequential Number with Each Row Representing 1 Record

Death / Injury Record Template



One-Time Historical Reporting

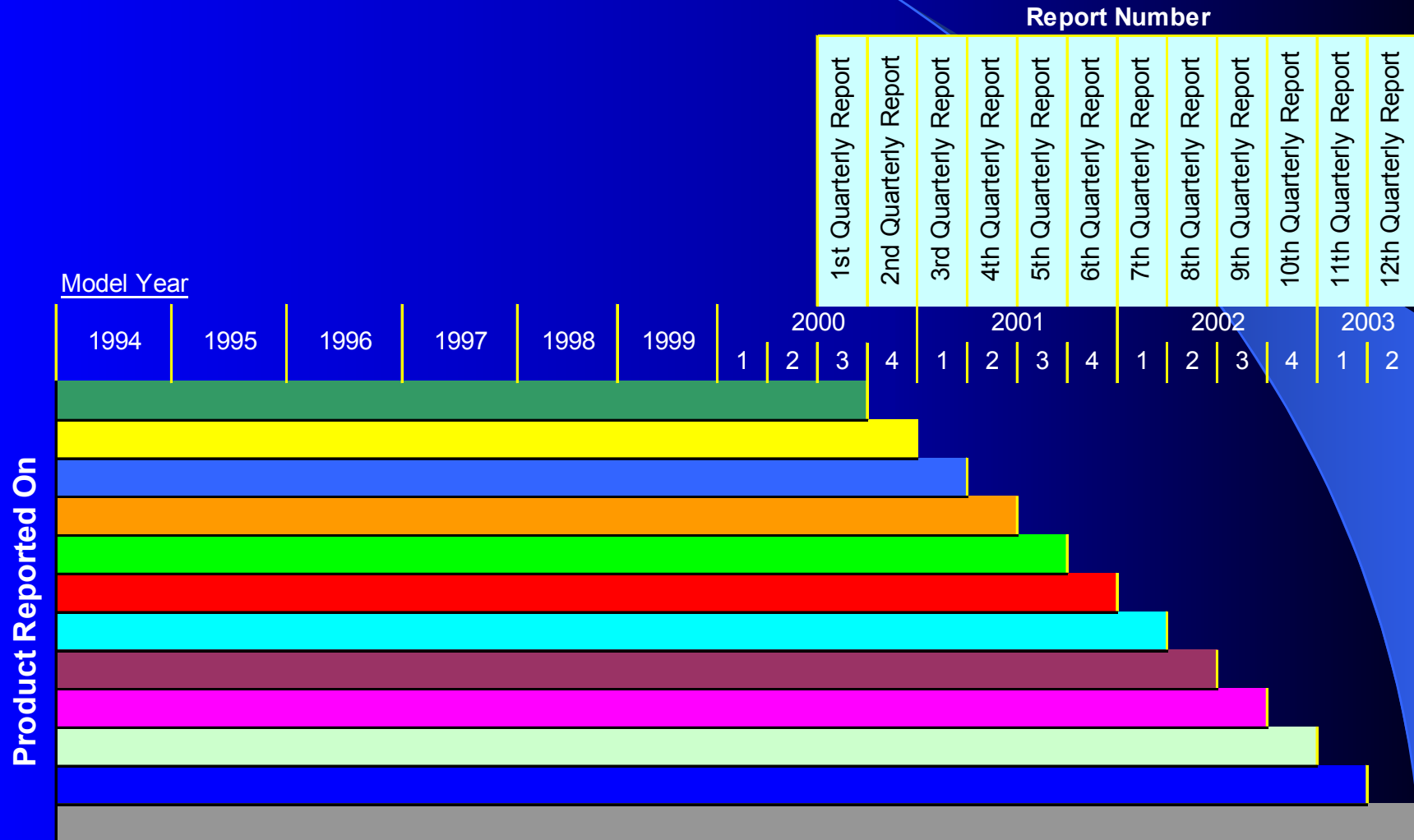
Historical Data: Production Totals, Number of Warranty Claims and Field Report Counts for Preceding 12 Quarters (July 1, 2000 through June 2003)

Submitted Electronically Using Standard Templates, Completing Production, Warranty, and Field Reports

Counts Only, no field reports or claims submitted



Historical Reporting





Field Report Submissions

- ❖ Delayed; First Reporting Quarter January-March 2004
- ❖ Due 30 Days After Submission of Aggregate Data
- ❖ Does NOT Include DEALER Reports, these are in Counts only



Field Report Submissions

- ❖ Submitted Reports are to be those addressing:
 - Products Reported in the Production Template;
 - Issued During the Reporting Quarter; and
 - Affecting 1 or More of the Applicable Components,
Fire or Rollover



Field Report Submissions

Submitted Field Reports by definition contain an Assessment of an Alleged Failure, Malfunction, Lack of Durability, or Other Performance Problem of a Manufacturer's Product by an Employee or Representative of the Manufacturer.



Field Report Submissions

❖ Attachments to Field Reports Need Not Be Submitted, But the Presence of an Attachment Must be Clearly Stated in the Field Report Submission.



Field Report Submissions

- Each Submitted Field Report Must Have a Distinct File Name that will be used to Identify the Field Report
- File Name Identifies the Subject Product(s) and the Components Reported On, Including 23 and 24. Components 99 Not Allowed.



Field Report Submissions

- Acceptable Formats: PDF, TIF, TXT, DOC, RTF, and JPEG
- Where All or a Portion of a Field Report cannot be provided, a Field Report Content Transcript is to be used—to be available on the Web



Manner of Reporting

- External Communications and Foreign Recalls **DO NOT** Require a Manufacturer ID and Password. Not to be sent through SFTP----Send to ODI by Mail or Email.
- Explanatory or Mandatory Coversheets or Documents to ODI via mail or appropriate email site.



Manner of Reporting

- All Aggregate and Historical Reports, Electronic Field Reports Submissions Require a Manufacturer ID, Account Name, and Password---Whether through the SFTP or the Web Site.
- Aggregate and Historical Reports, Electronic Field Reports Submissions Are Only Submissions Accepted via the SFTP. All other submissions to be sent to ODI.



File Naming Convention

Quarterly Aggregates and the One-Time Historical Report
will require Distinct File Names.



File Name Example: **123456**Y033001A00001.xls



Unique manufacturer ID number with leading “0” if required



File Name Example: 123456Y033001A00001.xls



**Report
Category**

C – Child Restraint Systems

H – Medium-Heavy Vehicle/Bus

L – Light Vehicle

Y – Trailer

M – Motorcycle

T – Tires

E – Equipment

Z – Below Threshold Vehicles



File Name Example: 123456Y033001A00001.xls



Report Year: Two-digit calendar year (YY)



File Name Example: 123456Y03**3**001A00001.xls



Report Quarter: One-digit report quarter (1-4)



File Name Example: 123456Y033001A00001.xls

Report Version: Three-digit version number of report.
Begins with “001”



File Name Example: 123456Y033001**A**000001.xls



Report Type

A – Aggregate Data

D – Death / Injury Data

F – Field Report (File naming only)



File Name Example: 123456Y033001A00001.xls



Sequence number for the quarter. Begins with “00001”.



File Name Example: 123456Y033001A00001.xls



File Extension: Format



Field Report Submission Naming Requirements

Whether Submitted Electronically or in Hard Copy Each
Field Report Must be Individually Identified with a Distinct
File Name

File Name Example: SNAME_0102_1011_00001_1.pdf



Field Report Naming Requirements (Electronic Submission of Non-Dealer Field Reports)

File Name Example: **S**NAME_0102_1011_00001_1.pdf



Application

S – Single Model

P – Single Platform (Vehicles)

M – Multiple Models or Platforms

T – Transcription of Field Report



Field Report Naming Requirements (Electronic Submission of Non-Dealer Field Reports)

File Name Example: **SNAME** 0102_1011_00001_1.pdf



Identifies one model or platform referenced in the field report.
Truncation of a name is allowed. No abbreviations or spaces.

Insert Delimiter “_”



Field Report Naming Requirements (Electronic Submission of Non-Dealer Field Reports)

File Name Example: SNAME_0102_1011_00001_1.pdf



Two characters to represent earliest model year model or product year referenced in the report followed by two character year of last model or product year. (“0103” refers to 2001 – 2003)

Insert Delimiter “_”



Field Report Naming Requirements (Electronic Submission of Non-Dealer Field Reports)

File Name Example: SNAME_0102_1011_00001_1.pdf



Two-digit component or system number (from aggregate sheet) that reference the subject of the field report. Up to 5 components may be referenced. Codes “98” and “99” are not permitted.

Insert Delimiter “_”



Field Report Naming Requirements (Electronic Submission of Non-Dealer Field Reports)

File Name Example: SNAME_0102_1011_00001_1.pdf



Sequence number for the reporting quarter for use in identifying multiple field reports for Model, Platform, Model Year, Components.

Insert Delimiter “_” only if attachment number is to follow.



Field Report Naming Requirements (Electronic Submission of Non-Dealer Field Reports)

File Name Example: SNAME_0102_1011_00001_1.pdf



Numeric value of 1-999 to identify attachments to Field Reports.



Field Report Naming Requirements (Electronic Submission of Non-Dealer Field Reports)

File Name Example: SNAME_0102_1011_00001_1.pdf

File Extension

Acceptable Formats:

Adobe PDF - .pdf

Tag Image Format - .tiff

Text - .txt

MS Word - .doc

Rich Text - .rtf



Manufacturer ID Management

ODI Assigns Each Manufacturer:

Manufacturer ID

EWR Account Name

Temporary Password

Need Completed **EWR Account Application Form**
from the manufacturer Before these are Issued



EWR Account Application Form

- ❖ Will be available on the Web or from ODI
- ❖ Expect to have Available by the End of June
- ❖ Spreadsheet intended to identify Manufacturer, Primary and Secondary Contacts, and Other Information
- ❖ Also contains Validation and Verification Protocols for Primary and Secondary Contact.



Manufacturer ID Management

- Accept EWR Account Applications in July
- Begin Issuing in Manufacturer ID in August
- Manufacturers then need to go to our public web site
- Using Secure Socket Layer (SSL), enter the EWR Manufacturer Account area of the web site to change their password.



Manufacturer ID Management

- With the new password, the manufacturer will be encouraged test Accessibility
- Detailed Instructions in Letter from ODI
- The Temporary Password will not work at the SFTP Site
- Forgotten Passwords Re-contact ODI and Verification of Primary/Secondary Contact



Submitting Through the SFTP

Using New Password, User Account Name, Manufacturer ID,
Submission is Made.

2 Levels of Validation for Acceptance:

- ❖ File Name
- ❖ File



Submitting Through the SFTP

Notified by Email if Accepted or Rejected by Artemis

If Rejected by Either Validation,

Reasons for Rejection Will Be Identified



Submitting Through the SFTP

After Notice of Rejection, Manufacturer has 2 Weeks to Re-send

Can Re-send 3 times Without Acceptance, Then Cannot Re-send Without Contact with ODI

After Discussion with ODI, Can Re-send for 3 More Times, Then Cycles Again



Submitting Through the SFTP

After Initial Acceptance, Version is 1—All Submissions

If Re-submission is Necessary, Version for that Submission
is Incremented by 1



Submitting Through the SFTP

Can Re-submit for a Total of 9 Times per
Reporting Quarter Submission

Unfettered Re-submission Prior to Due Date

After Due Date, Requires Cover Letter to
ODI for Concurrence Before Artemis
Accepts



National Highway Traffic Safety Administration
Early Warning Reporting Public Meeting
June 2003

Presented by the Office of Defects Investigation

Document or Data Submission Type	Due Date (Within)	Notations													
Foreign Safety Recall and Campaign Reporting	5 Working days of a determination or order to conduct a safety recall or campaign	Daily Identical or substantially similar vehicles													
External Communications	5 days of the month’s end in which the communication was issued	Monthly													
Substantially Similar Vehicle List	November 1 each year	Annually													
EWR Aggregate Data	30 days of end of reporting quarter	3 rd Quarter 2003 due 12/01/03 (60 days) 4 th Quarter 2003 due 03/01/04 (60 days) 1 st Quarter 2004 due 06/01/04 (60 days) 2 nd Quarter 2004 due 07/30/04 (30 days)													
Death/Injury Report	30 days of end of reporting quarter AND following submission of the EWR data	For manufacturers required to submit EWR Data, Death/Injury Report must be submitted after EWR Aggregate Data is submitted													
Field Reports	30 days following the due date for quarterly EWR aggregate data	1 st reporting quarter is January-March 2004 which is due 07/01/04													
Historical Data (One-Time Reporting)	December 31, 2003 12 Quarterly Reports:	<table><tr><td>July - September 2000</td><td>January - March 2002</td></tr><tr><td>October - December 2000</td><td>April – June 2002</td></tr><tr><td>January - March 2001</td><td>July – September 2002</td></tr><tr><td>April - June 2001</td><td>October – December 2002</td></tr><tr><td>July - September 2001</td><td>January – March 2003</td></tr><tr><td>October - December 2001</td><td>April – June 2003</td></tr></table>		July - September 2000	January - March 2002	October - December 2000	April – June 2002	January - March 2001	July – September 2002	April - June 2001	October – December 2002	July - September 2001	January – March 2003	October - December 2001	April – June 2003
July - September 2000	January - March 2002														
October - December 2000	April – June 2002														
January - March 2001	July – September 2002														
April - June 2001	October – December 2002														
July - September 2001	January – March 2003														
October - December 2001	April – June 2003														



Post Data Review

Death Report Follow-up—

Largely informal contact and
clarification/discussion on reported U.S. death
incidents



Post Data Review

Report Clarification (RC)

- After review of MFR's Submission we may Require Clarification of Process or Data
- Request typically will be in Writing
- Not Considered a NHTSA Investigation, clarification and request for EWR-related data



The EWR Compendium

Manufacturer's Guide to EWR Reporting

“Complete,” Unified Guide to Requirements, our Administrative Policies, File Naming, Data Validation, File Transfer Protocols, and How to on Templates, with



The EWR Compendium

Each Manufacturer will receive one with the
Manufacturer ID, Account Name, and Temp
Password

Will be available on web site in August or sooner.

Separate Guide for Vehicles, Tires, Child Seats,
Below Threshold Vehicle, and Equipment
Manufacturers.

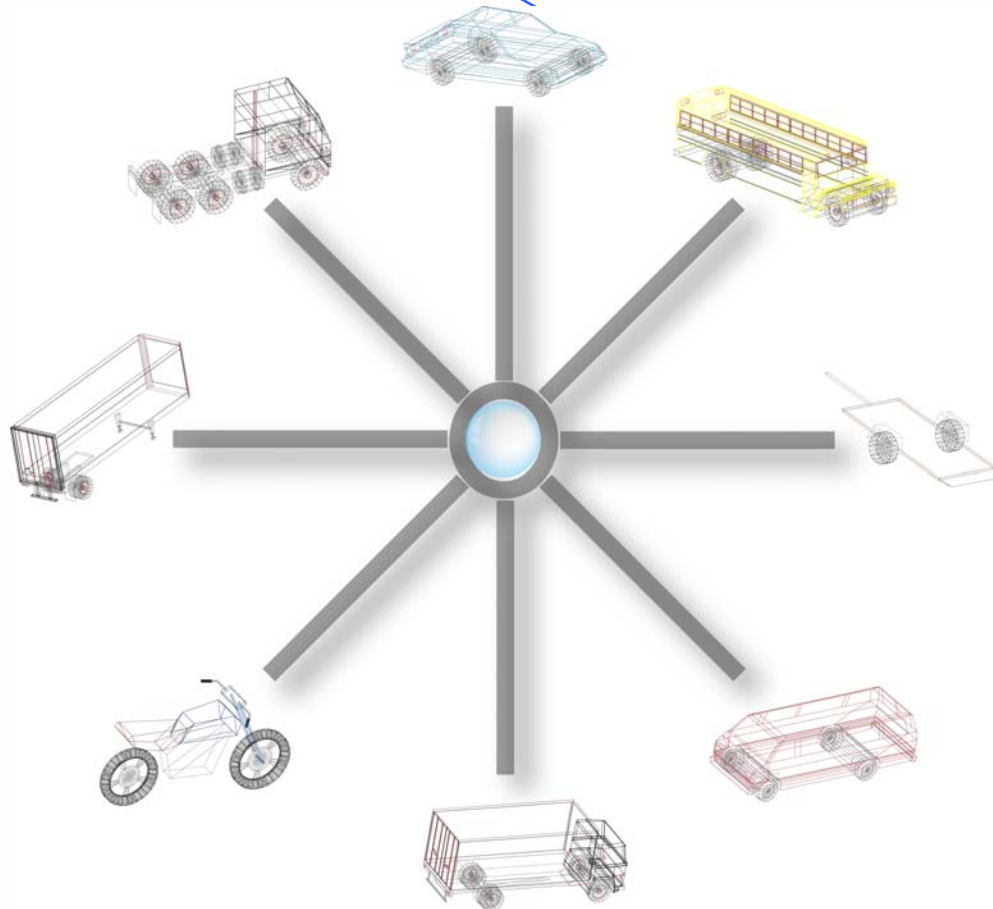


Contact Information:

		<i>Phone</i>	<i>Fax</i>	<i>E-mail</i>
General Assistance	Office of Defects Investigation	202-366-0699	202-366-7882	ewrhel@nhtsa.dot .gov
Legal Issues	Office of Chief Counsel	202-366-5263		
E-Mail EWR Submissions*	Office of Defects Investigation	202-366-0699	N/A	odi.ewr@nhtsa.dot.gov
External Communications/ TSB	Office of Defects Investigation	202-366-0699	N/A	tsb@nhtsa.dot.gov
Foreign Recalls- Substantially Similar Vehicle List	Office of Defects Investigation	202-366-0699	N/A	frecalls@nhtsa.dot.gov
Assistance with Electronic Submissions to Artemis	Artemis Help Desk	617-374-2776	N/A	Artemishelpdesk@volpe.dot.gov



**National Highway Traffic Safety Administration
Early Warning Reporting Public Meeting
June 2003**



Presented by the Office of Defects Investigation



Manufacturer Type								
Applicable Regulation	Light Vehicle	Medium/ Heavy Vehicle & Bus	Motor-cycle	Trailer	Child Restraint Systems	Tires	Other Motor Vehicle Equip.	Vehicle Mfgs. <500 Annually
External Communications	●	●	●	●	●	●	●	●
Foreign Recalls/Campaigns	●	●	●	●	●	●	●	●
Production	●	●	●	●	●	●		
Fatality Claims and Notices	●	●	●	●	●	●	●	●
Injury Claims and Notices	●	●	●	●	●	●		
Numbers of Property Damage Claims	●	●	●	●		●		
Numbers of Consumer Complaints	●	●	●	●	●			
Numbers of Warranty Claims	●	●	●	●	●	●		
Numbers of Field Reports	●	●	●	●	●			
Copies of Non-Dealer Field Report	●	●	●	●	●			



Overview of quarterly reporting responsibilities for manufacturers of all motor vehicles and motor vehicle equipment.

Copies of External Communications:

- Due within 5 days of the end of the month in which the communication is sent or made available.
- Campaign-related documents to be submitted beginning July 1, 2003.

Foreign Recalls & Other Safety Campaigns:

- Due within 5 days of the decision or Order to initiate the foreign recall.



Overview of quarterly reporting responsibilities for manufacturers of child safety systems.

Production:

- Current production as of the end of reporting quarter and total production for 4 previous model years.
- Due within 30 days of the end of the calendar reporting quarter.



Overview of quarterly reporting responsibilities for manufacturers of child safety systems.

- Number of Consumer Complaints
- Number of Warranty Claims
- Claims received during the quarter on current production and preceding 4 model years.
- Due within 30 days of the end of the calendar reporting quarter.



Overview of quarterly reporting responsibilities for manufacturers of child safety systems.

Number of Field Reports

- Dealer and field reports received during the quarter on current production and the preceding 4 model years.
- Due within 30 days of the end of the calendar reporting quarter.



Overview of quarterly reporting responsibilities for manufacturers of child safety systems.

- Fatality Claims and Notices
- Injury Claims and Notices
- Notice or Claims received during the quarter on current production and the preceding 4 model years of production.
- Due within 30 days of the end of the calendar reporting quarter (to be submitted after EWR Aggregate Data).



Overview of quarterly reporting responsibilities for manufacturers of child safety systems.

Copies of Non-Dealer Field Reports

- A copy of each field report issued during quarter on current production and preceding 4 model years.
- Due within 30 days after the submission of the aggregate quarterly report (1st submission to include 1st Quarter, 2004, due 07/01/04).



Microsoft Excel - ChildRestraints.xls

File Edit View Insert Format Tools Data Financial Manager Window Help Acrobat

B2 =

	A	B	C	D	E	F	G
1	InfoName	InfoValue					
2	ManufacturerName						
3	ReportQuarter						
4	ReportYear						
5	ReportName	ChildRestraints					
6	ReportVersion						
7	ReportGeneratedDate						
8	ReportContactName						
9	ReportContactEmail						
10	ReportContactPhone						
11	NHTSATemplateRevisionNo	1.2					
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ReportInfo Production ComplaintsWarrantyClaims FieldReports

Child Restraint System Template



Microsoft Excel - ChildRestraints.xls

File Edit View Insert Format Tools Data Financial Manager Window Help Acrobat

A2 =

	A	B	C	D	E	F	G	H	I	J	K
	Make	Model	ProdYear	Type	TotalProduction						
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ReportInfo Production ComplaintsWarrantyClaims FieldReports

Child Safety Systems Production Worksheet



Microsoft Excel - ChildRestraints.xls

File Edit View Insert Format Tools Data Financial Manager Window Help Acrobat

A2 =

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Make	Model	ProdYear	Buckle-51	SeatShell-52	Handle-53	Base-54							
2														
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Component Codes

Aggregate Worksheet

ReportInfo Production ComplaintsWarrantyClaims FieldReports



Microsoft Excel - ChildRestraintsDi.xls

File Edit View Insert Format Tools Data Financial Manager Window Help Acrobat

B2 =

	A	B	C	D	E	F	G
1	InfoName	InfoValue					
2	ManufacturerName						
3	ReportQuarter						
4	ReportYear						
5	ReportName	ChildRestraintsDI					
6	ReportVersion						
7	ReportGeneratedDate						
8	ReportContactName						
9	ReportContactEmail						
10	ReportContactPhone						
11	NHTSATemplateRevisionNo	1.2					
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ReportInfo DeathsInjuries

Death and Injury
Worksheet
Information Page



Microsoft Excel - ChildRestraintsDi.xls

File Edit View Insert Format Tools Data Financial Manager Window Help Acrobat

A2 =

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
	ID	ManUniqueID	Make	Model	ProdYear	IncidentDate	NumDeaths	NumInjuries	StateOrFCntry	SysOrCompA	SysOrCompB	SysOrCompC	SysOrCompD	SysOrCompE
1														
2														
3														
4														
5														
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17														
18														
19														
20														
21														
22														

Minimum Specificity

Component Code

Incidents numbered sequentially, beginning with "1"

Death / Injury Incident Reporting Page



Extended Due Dates for 4 Initial Reporting Quarters of EWR Aggregate Data:

- 1st Report--3rd Quarter 2003 due 12/01/03 (60 days)
- 2nd Report--4th Quarter 2003 due 03/01/04 (60 days)
- 3rd Report--1st Quarter 2004 due 06/01/04 (60 days)
- 4th Report--2nd Quarter 2004 due 07/30/04 (30 days)

Death / Injury Reports should be sent AFTER Aggregate Data has been sent.



Submission of Field Reports:

- First reporting quarter is January – March, 2004
which is due 07/01/04.



***Historical Data due December 31, 2003 and
should include 12 individual quarterly reports
covering July, 2000 through June, 2003.***

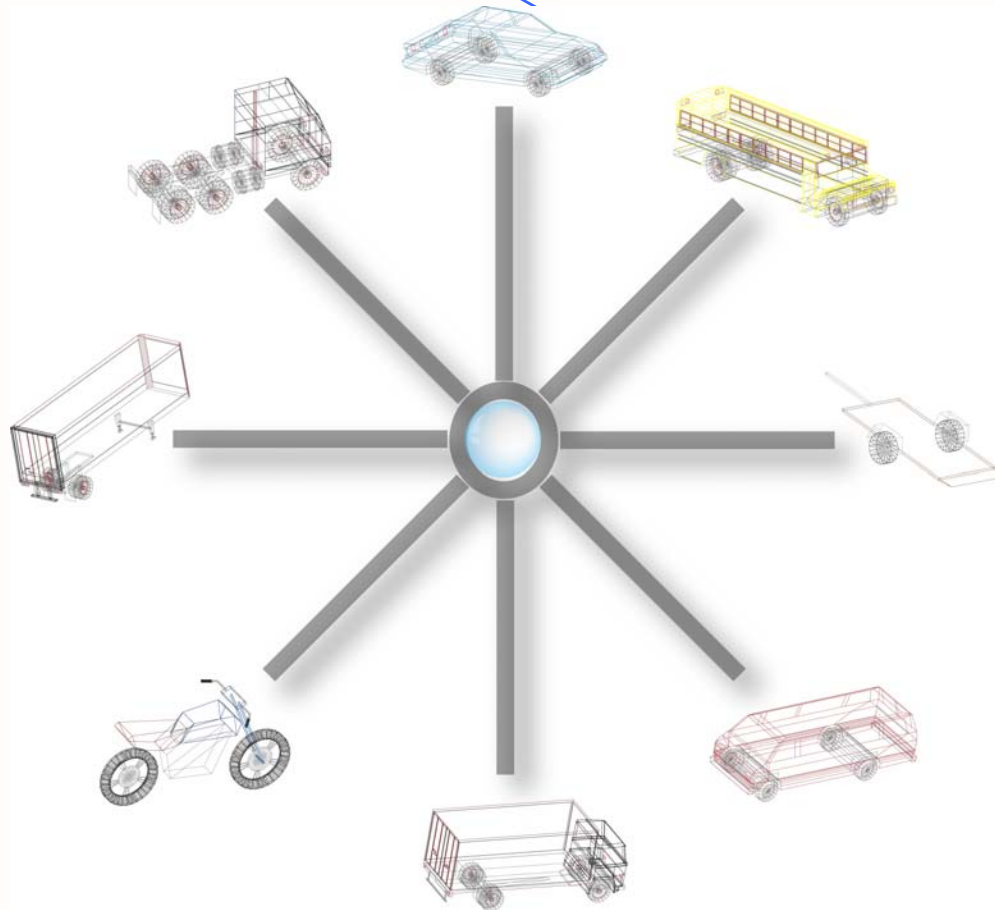


Contact Information:

		<i>Phone</i>	<i>Fax</i>	<i>E-mail</i>
General Assistance	Office of Defects Investigation	202-366-0699	202-366-7882	ewrhhelp@nhtsa.dot.gov
Legal Issues	Office of Chief Counsel	202-366-5263		
E-Mail EWR Submissions*	Office of Defects Investigation	202-366-0699	N/A	odi.ewr@nhtsa.dot.gov
External Communications/ TSB	Office of Defects Investigation	202-366-0699	N/A	tsb@nhtsa.dot.gov
Foreign Recalls	Office of Defects Investigation	202-366-0699	N/A	frecalls@nhtsa.dot.gov
Assistance with Electronic Submissions to Artemis	Artemis Help Desk	617-374-2776	N/A	Artemishelpdesk@volpe.dot.gov



National Highway Traffic Safety Administration Early Warning Reporting Public Meeting June 2003



Presented by the Office of Defects Investigation



Manufacturer Type								
Applicable Regulation	Light Vehicle	Medium/ Heavy Vehicle & Bus	Motor-cycle	Trailer	Child Restraint Systems	Tires	Other Motor Vehicle Equip.	Vehicle Mfgs. <500 Annually
External Communications	●	●	●	●	●	●	●	●
Foreign Recalls/Campaigns	●	●	●	●	●	●	●	●
Production	●	●	●	●	●	●		
Fatality Claims and Notices	●	●	●	●	●	●	●	●
Injury Claims and Notices	●	●	●	●	●	●		
Numbers of Property Damage Claims	●	●	●	●		●		
Numbers of Consumer Complaints	●	●	●	●	●			
Numbers of Warranty Claims	●	●	●	●	●	●		
Numbers of Field Reports	●	●	●	●	●			
Copies of Non-Dealer Field Report	●	●	●	●	●			



Overview of quarterly reporting responsibilities for manufacturers of all motor vehicles and motor vehicle equipment.

Copies of External Communications:

- Due within 5 days of the end of the month in which the communication is sent or made available.
- Campaign-related documents to be submitted beginning July 1, 2003.

Foreign Recalls & Other Safety Campaigns:

- Due within 5 days of the decision or Order to initiate the foreign recall.



Overview of quarterly reporting responsibilities for manufacturers of tires.

Production:

- Current production as of the end of reporting quarter and total production for 4 previous model years.
- Due within 30 days of the end of the calendar reporting quarter.



Overview of quarterly reporting responsibilities for manufacturers of tires.

- Number of Property Damage Claims
- Number of Warranty Adjustments
- Claims received during the quarter on current production and preceding 4 model years.
- Due within 30 days of the end of the calendar reporting quarter.



Overview of quarterly reporting responsibilities for manufacturers of tires.

Common Green Reporting

- Identification of Common Green (worksheet).
- Due within 30 days of the end of the calendar reporting quarter with aggregate data.



Overview of quarterly reporting responsibilities for manufacturers of tires.

- Fatality Claims and Notices
- Injury Claims and Notices
- Notice or Claims received during the quarter on current production and the preceding 4 model years of production.
- Due within 30 days of the end of the calendar reporting quarter (to be submitted after EWR Aggregate Data).



Microsoft Excel - Tires.xls

File Edit View Insert Format Tools Data Financial Manager Window Help Acrobat

B2 =

	A	B	C	D	E	F	G
1	InfoName	InfoValue					
2	ManufacturerName						
3	ReportQuarter						
4	ReportYear						
5	ReportName	Tires					
6	ReportVersion						
7	ReportGeneratedDate						
8	ReportContactName						
9	ReportContactEmail						
10	ReportContactPhone						
11	NHTSATemplateRevisionNo	1.2					
12							
13							
14							
15							
16							
17							
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28							

ReportInfo Production ProdSKUTypeCode ProdOEvehApp PropertyDamage WarrantyAdjustments

← Contact Information

Tires Template
Information Page



Microsoft Excel - Tires.xls

File Edit View Insert Format Tools Data Financial Manager Window Help Acrobat

A2 =

	A	B	C	D	E	F	G	H	I	J
	TireLine	TireSize	SKU	ProdYear	PlantCode	OrigEquip	WarrantyProduction	TotalProduction		
1										
2										
3										
4										
5										
6										
7										
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11										
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18										
19										
20										
21										

ReportInfo Production ProdSKUTypeCode ProdOEvehApp PropertyDamage WarrantyAdjustments



Microsoft Excel - Tires.xls

File Edit View Insert Format Tools Data Financial Manager Window Help Acrobat

A2 =

	A	B	C	D	E	F	G	H	I	J
1	SKU	TypeCode								
2										
3										
4										
5										
6										
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25										

ReportInfo Production ProdSKUTypeCode ProdOEvehApp PropertyDamage WarrantyAdjustments

Product SKU Worksheet



Microsoft Excel - Tires.xls

File Edit View Insert Format Tools Data Financial Manager Window Help Acrobat

A2 =

	A	B	C	D	E	F	G	H	I	J
1	SKU	VehicleMake	VehicleModel	VehicleModelYear						
2										
3										
4										
5										
6										
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ReportInfo Production ProdSKUTypeCode ProdOEVehApp PropertyDamage WarrantyAdjustments

Original Equipment
Vehicle Application
Worksheet



Microsoft Excel - Tires.xls

File Edit View Insert Format Tools Data Financial Manager Window Help Acrobat

A2 =

	A	B	C	D	E	F	G	H	I	J	K	L
	TireLine	TireSize	SKU	PlantCode	ProdYear	Tread.71	SideWall.72	Bead.73	Other.98			
1												
2												
3												
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6												
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24												

ReportInfo Production ProdSKUTypeCode ProdOEvehApp **PropertyDamage** WarrantyAdjustments

Component Codes

Aggregate Worksheet

(Identical for Property Damage
and Warranty Adjustment)



Microsoft Excel - Tires.xls

File Edit View Insert Format Tools Data Window Help

J31 =

	A	B	C	D	E	F	G	H	I	J
1	CGreenGroup	TireLine	TypeCode	SKU	PlantCode	BrandName	BrandOwner			
2										
3										
4										
5										
6										
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29										
30										
31										

Common Green
Reporting Worksheet

ReportInfo / Production / ProdSKUTypeCode / ProdOEvehApp / PropertyDamage / WarrantyAdjustments / CommonGreen

Ready



Microsoft Excel - TiresDi.xls

File Edit View Insert Format Tools Data Financial Manager Window Help Acrobat

B2 =

	A	B	C	D	E	F	G
1	InfoName	InfoValue					
2	ManufacturerName						
3	ReportQuarter						
4	ReportYear						
5	ReportName	TiresDI					
6	ReportVersion						
7	ReportGeneratedDate						
8	ReportContactName						
9	ReportContactEmail						
10	ReportContactPhone						
11	NHTSATemplateRevisionNo	1.2					
12							
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28							

ReportInfo DeathsInjuries

Death / Injury Report
Information Page



Microsoft Excel - TiresDi.xls

File Edit View Insert Format Tools Data Financial Manager Window Help Acrobat

A2 =

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R
1	ID	ManUniqueID	TireLine	TireSize	ProdYear	TIN	IncidentDate	NumDeaths	NumInjuries	StateOrFCntry	VehicleMake	VehicleModel	VehicleModelYear	CompA	CompB	CompC	CompD	CompE
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9																		
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21																		
22																		

Minimum Specificity

OEM Applications

Component Codes

Incidents numbered sequentially, beginning with "1"

Death / Injury Incident Reporting Page

ReportInfo DeathsInjuries



Extended Due Dates for 4 Initial Reporting Quarters of EWR Aggregate Data:

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Death / Injury Reports should be sent AFTER Aggregate Data has been sent.



***Historical Data due December 31, 2003 and
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Foreign Recalls	Office of Defects Investigation	202-366-0699	N/A	frecalls@nhtsa.dot.gov
Assistance with Electronic Submissions to Artemis	Artemis Help Desk	617-374-2776	N/A	Artemishelpdesk@volpe.dot.gov

UNITED STATES OF AMERICA{PRIVATE }

+ + + + +

DEPARTMENT OF TRANSPORTATION

+ + + + +

NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION

+ + + + +

OFFICE OF DEFECTS INVESTIGATION

+ + + + +

EARLY WARNING REPORTING PUBLIC MEETING

+ + + + +

WEDNESDAY
JUNE 18, 2003

The meeting was held at 9:30 a.m. (Session I)/
1:00 p.m. (Session II) in Room 8236 of the Department
of Transportation's Nassif Building, 400 Seventh
Street, SW, Washington, D.C., Ken Weinstein, Associate
Administrator for Enforcement, presiding.

PRESENT:

KEN WEINSTEIN	Associate Administrator for Enforcement
ANDREW DiMARSICO	Office of Chief Counsel
ROBERT SQUIRE	Defects Assessment Division
TAYLOR VINSON	Office of Chief Counsel
JONATHAN WHITE	Defects Assessment Division

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P-R-O-C-E-E-D-I-N-G-S

9:36 a.m.

CHAIRMAN WEINSTEIN: On the record. Good morning. My name is Ken Weinstein. I'm the Associate Administrator for Enforcement with National Highway Traffic Safety Administration ("NHTSA"). With me at the table is Jon White who is the head of the Division of the Office of Defects Investigation ("ODI") that reviews matters. We call them the "Screening Division." He doesn't like that name. What is your official title, Jon?

MR. WHITE: Defects Assessment.

CHAIRMAN WEINSTEIN: Defects Assessment Group. Basically this group initially looks at matters and raises issues within ODI that might lead to potential defect investigations. Bob Squire is on his staff. Taylor Vinson and Andrew DeMarsico from our Chief Counselor's Office are also at the head table.

Thank you all for coming. As you all know, the TREAD Act among other things authorized and directed NHTSA to adopt regulations that would require manufacturers of motor vehicles and motor vehicle equipment to provide information to NHTSA that would help us to promptly identify potential defects. We

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1 met the very short and very optimistic requirements
2 for getting those rules out in a timely fashion. We
3 issued the Early Warning Rule ("EWR" or "Rule"), the
4 final rule, last July.

5 Since that time, we have issued some
6 amendments to that Rule in response to petitions for
7 reconsideration. There are some other issues on
8 reconsideration still pending which we hope to get
9 resolved in the very near future. We also have
10 extended the time period for submitting information.
11 It's a little complicated. We basically extended the
12 90 days with some other extensions for certain types
13 of information.

14 We have also issued numerous
15 interpretations of our Rule. Those have been
16 collected and are available in one place on the NHTSA
17 website which can be found by going to the homepage
18 and then clicking on ODI and then looking for EWI
19 which stands for Early Warning Interpretations. I'm
20 told it's very easy to do that. If I'm wrong, then
21 complain to Jon.

22 We had another public meeting several
23 months ago where we made NHTSA folks available to
24 answer questions about implementation of the Rule.
25 This meeting is designed to focus on what I'll call

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1 "Process Questions". "How materials are actually
2 submitted" as opposed to substantive questions about
3 exactly "What is a field report" or something like
4 that.

5 The other meeting was probably designed to
6 do that as well and it slipped. I expect that
7 there'll be some slippage today as well. We will do
8 our best to answer questions but I want to emphasize
9 as I did last time that what we say here as far as
10 interpretations are not binding on the Agency.
11 Longstanding policy is that interpretation of our
12 rules are made by the Chief Counsel in response to
13 written inquiries and they're made in writing.

14 If you hear something that you either
15 agree with or disagree with and you want to get a
16 formal interpretation on an issue, you need to write
17 in to Jacqueline Glassman who is the NHTSA Chief
18 Counsel and we will attempt to turn that around
19 quickly. Recently we have been responding to
20 interpretation requests very promptly. We understand
21 the need of the industry to get interpretations
22 because they are preparing their submissions.

23 I guess with that said, I'm going to turn
24 the meeting over for the moment to Jon White who will
25 make a presentation. He will tell you some things

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1 that we hope will be of interest to you and of
2 importance to you. Then we will open it up for
3 questions. I myself will probably have to leave
4 before this is over but I'll leave you in capable
5 hands. Jon.

6 By the way when we're going to have
7 questions, please identify yourself, say what your
8 company or other organization you're with is and try
9 to speak as loudly as possible so the court reporter
10 can pick it up. If necessary, we may have to repeat
11 questions but we'll try to avoid that.

12 MR. WHITE: Good morning. We're going to
13 briefly go over the regulations and walk through each
14 piece, the changes that have been made, go through the
15 templates, talk about the schedule that's been changed
16 and how that affects you all now. We're going to go
17 through the manner of reporting briefly and then we're
18 going to stay with the user IDs and how those might be
19 handled and when we're going to be doing that. Then
20 we'll open it up to questions. Really what we want to
21 get to is your questions.

22 Subpart A just briefly goes through the
23 terminology. In the current regulations, we added two
24 more definitions, "control" which affects
25 manufacturers and "handle for child seats". There

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1 have been some other terms that have been modified.
2 You'll be able to see that in Notice 5.

3 CHAIRMAN WEINSTEIN: I don't know if
4 people know what Notice 4 and Notice 5 are.

5 MR. WHITE: Good point. On June 11, 2003
6 in the Federal Register, Notice 5, which was a
7 response to the initial petitions for reconsideration
8 and it also had some results for the initial meetings
9 we had with the industry in January up at Cambridge.
10 That was published on Wednesday, June 11th, and we also
11 published Notice 6 which changed the schedule. That's
12 what we're going over here as well but Notice 5 is the
13 regulatory changes. Notice 6 is the schedule change.

14 CHAIRMAN WEINSTEIN: And Notice 4 had been
15 issued in April I believe. It responds to several
16 other issues raised by petitions for reconsideration.
17 The numbers just relate to the way the Federal
18 Register specifies the various documents.

19 MR. WHITE: Subpart A also contains in it
20 a requirement for external communications. External
21 communications is the old 573.8, Submission of Service
22 Bulletins, but it also has been expanded to include
23 safety recalls, consumer satisfaction campaigns and
24 communications of this type sent to more than one
25 dealer. Originally it was due in April. It's been

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1 rolled back so it's due July 1st for that part of it.

2 They are monthly submissions as opposed to
3 daily which is the next one which would be foreign
4 recalls. If you are U.S. manufacturer or manufacturer
5 selling or importing tires into this country and
6 conduct a campaign in a foreign market and that tire
7 has a substantially similar U.S. product, then you are
8 obligated to report that to us within five days so
9 that there is a determination either by the company or
10 by the foreign government if it ordered a recall.

11 In the handouts we gave you, there's a
12 basic table contained what "substantially similar"
13 meant but it also contained "minimal specificity"
14 which comes up later. It's an important concept.

15 Subpart C is what everybody refers to as
16 "early warning requirements." It basically requires a
17 manufacturer relied production, counts of warranty
18 adjustments for tires and property damage claims and
19 then the incidents of death and injury. The reason we
20 put in that order is because that's how we're going to
21 want you to file it. I'll go through that more later
22 on.

23 This is quarterly report. It's due
24 nominally 30 days after the end of a calendar quarter.

25 For the first three reports that would be the last

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1 two in 2003 and the first one in 2004, it's a 60-day
2 delivery. We'll go over the schedule and it's also in
3 your handouts.

4 We have the templates. You've probably
5 all seen them. They've been there since August of
6 last year. We're going to be updating those probably
7 next week with the new versions of them and we'll get
8 to those in just a minute.

9 Let's go to Common Greens. Common Greens
10 just provides for an identification for us to prove
11 what the common tires are when we're trying to make
12 sense of the listing that's been provided to us and
13 identify brand name and brand name owners where those
14 tires may have gone and they may be comparably
15 similar. We get to identify the entire package. In
16 some instances, that will be maybe pretty straight
17 forward. In others, I understand there's going to be
18 a bit of concern over that.

19 Let's get to the templates. These are the
20 templates as they come in. This is the first one.
21 Expect this to be filled out in each instance. We're
22 giving our revision numbers as we go to try to keep up
23 with them. Maybe you want to put a date in there.
24 This is how it looks now. We're going to release
25 this.

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1 This is the first part of the production
2 one. Production, metal specificity, manufacturer,
3 tire line, tire size, SKU, production year and then
4 plant code for the tire, whether it's original
5 equipment or not, and then the two production types,
6 warranty and total production. Then we have a SKU
7 listing with a type code to keep those aligned. We
8 had some indication from non-RMA members that they
9 didn't use SKU necessarily. There were others used
10 with type code. We'll have to see how that works out.

11 This is when an original equipment has
12 been identified for the particular tire giving a SKU
13 and then crossing that with the vehicle and vehicle
14 model and then model years.

15 CHAIRMAN WEINSTEIN: It could be more than
16 one, right?

17 MR. WHITE: It may be more than one or can
18 be a platform. It depends on the extent that the tire
19 manufacturer would know the information. This is in
20 the aggregates for property damage. The tire line,
21 tire size, crossing with the vehicle model, model
22 years, SKU, plant code, production year and then
23 tread, side wall and bead and also for tires, "other".

24 COURT REPORTER: Mr. White, would you
25 stand closer to the microphone?

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1 CHAIRMAN WEINSTEIN: She needs to be able
2 to hear you, Jon.

3 MR. WHITE: Yes. This is a Common Greens
4 template. It's one of the production types. It cross
5 references the Common Green with the tire line, type
6 code and SKU. Plant code which is listed there is not
7 in the current version. It's been changed. That
8 template needs to be corrected. That's the old
9 template. Then brand name and brand name owner.

10 CHAIRMAN WEINSTEIN: Are you saying, Jon,
11 we took out plant code?

12 MR. WHITE: Yes, it's no longer there.
13 We've separated the death and injury from the
14 production and warranty and property damage ones. The
15 reason for that is what you submit in production, that
16 first template, is quintessential. Whatever else you
17 present has to match that or we're going to reject
18 your submission. That's where we're validating.

19 You can't tell us in the production that
20 you've "Bullriders." The tire line is a "Bullrider"
21 or whatever and then when we get down to death and
22 injury or to the warranty, it's a "Bullrider Smooth
23 Ride." That's not going to work. It has to be the
24 "Bullrider." It's the same tire line, tire size. You
25 can't go with a superficial addition. If it's an

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1 addition, it's broken out and it should be broken out
2 in the production sheet and then carried through.

3 This is going through the death incidents
4 and injuries. Going through these rows, we're going
5 to change this also. This is the late change that
6 hasn't been put in there. There has been some
7 confusion over the ID. The ID is the sequence ID for
8 the number of fatalities and injury incidents reported
9 for that quarter. It starts with one and goes on to
10 however many it takes. The next quarter it starts all
11 over again with one and keeps on going. That's all it
12 is. It's a row number.

13 The manufacturer's unique ID, that's your
14 code; you can use it. I think we've given you 25
15 characters. There may be more than that. Alpha-
16 numeric, that's one of the few fields that can be
17 null, nothing in there. That's up to you. The only
18 thing we ask or require is that if you do provide one
19 and you have more than one entry that next one is
20 unique. It has to be unique for the reporting
21 quarter.

22 CHAIRMAN WEINSTEIN: Jon, doesn't each
23 manufacturer only have one?

24 MR. WHITE: No, this is their own code.
25 That's user ID. That's unique. The EWR ID is unique

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1 but this is their code and every manufacturer can use
2 it. It's basically to call it down by lawsuit or
3 however they want to identify it in their own files.

4 Minimal specificity is the tire line, the
5 tire size, production year, the tire identification
6 number ("TIN") of the tire. Now because this is death
7 and injury, this could be a foreign death. In that
8 case the TIN number here would be whatever the tire
9 number is if they have one in a foreign market.

10 But when it comes to what the product,
11 these minimal specificities that has to be the U.S.
12 substantially similar tire. If it's not that, it's
13 going to be rejected. Again it has to match what you
14 provided in production. We don't really care what the
15 tire was in the foreign market. We're not policing
16 foreign markets. We're trying to take care of the
17 U.S. market.

18 But the TIN on the tire, the
19 identification for the tire, can be for the tire that
20 occurred. The vehicle we're going to get to in a
21 minute. That again is up to you. Report the vehicle
22 that the tire occurred on in the foreign market. For
23 tires, we're not going to validate the vehicle make,
24 model, model year. That one can be a "Bullrider" XLS
25 or whatever. We're not particular on that.

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1 The incident date, the calendar date,
2 number of deaths, it's pretty self-explanatory. It's
3 the same for the injuries. It's whatever was alleged
4 or reported to you. The state or foreign country, the
5 rules on that for the U.S. territory or state, it's
6 two-character U.S. Post Office code. If it's a
7 foreign country, text. Write it out. We don't really
8 care what you write out for that. We're not
9 validating on your grammar or whether you picked the
10 most recent country according to the United Nations.
11 It can't be an abbreviation. It has to be longer than
12 three characters. By that, we'll know that it's a
13 foreign country and we're ready to go.

14 CHAIRMAN WEINSTEIN: Longer than two
15 characters.

16 MR. WHITE: Well, three or more. The
17 vehicle, make, model, model year. It doesn't
18 necessarily relate to the OEMs. If it was an OEM
19 tire, we certainly would not expect it to be there.
20 If it's a replacement tire, it could be any tire. It
21 could be a 1928 Ford. Whatever the tire is, that's
22 what it is as related to the incident.

23 The components. You're filling in there
24 even though we gave you five, it's going to be the
25 tread, sidewall, shoulder, bead and the 98 or 99.

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1 Ninety-nine when you don't have a clue what it is. If
2 you already entered something in there, don't put 99
3 in it. That won't be useful to us. We presume that
4 there might be other ones.

5 If you know what the allegation is but
6 it's not one of those areas we're reporting, that's a
7 98. We also request that when you're filling this in
8 that you start with System Component A ("CompA") and
9 work to the right. We don't necessarily care which
10 number you put in there. We're not forcing you to
11 make a judgment over which one was actually in the
12 most likely failure mode which was in the tread and
13 that's what goes in there.

14 I'm just saying that whatever the code is
15 that you're going to fill in there, it starts with
16 CompA and works to the right. Again if you have a 98
17 because it may be something else in addition to a
18 tread, we would ask that you start with whatever those
19 reporting codes are first and then 98 or 99 on the
20 other end.

21 CHAIRMAN WEINSTEIN: If it's 99, it's only
22 99. But you might have 71 and 98 because they might
23 allege tread and something else that's not one of the
24 three or four that we've identified.

25 MR. WHITE: The reasons we've split off

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1 this spreadsheet is to allow for when updates are
2 required when it's an aggregate or when it's in the
3 death or injury. We're asking you to update the
4 entire file. It all comes in. Since death and injury
5 is a mandatory update, if you don't have the TIN at
6 the time of the filing and you knew the TIN, you could
7 provide it back to us and put it in there.

8 If a product allegation, a death
9 allegation, comes to you and it doesn't meet tire
10 specificity or you don't know what the tire line, tire
11 size of the manufacturer, don't report it to us. We
12 don't want to know about it either. We want to know
13 about it when you find out. When you find out what
14 the tire line and tire size is, that's when you report
15 it. It doesn't matter whether the incident occurred
16 in the previous quarter or whatever. It's whenever
17 that knowledge becomes known.

18 Regarding updating, I might as well go
19 over that now. If you are going to update during the
20 reporting period from the end of the reporting quarter
21 to the due date, you can update as many times
22 conceivably as you wish. Basically that's not true.
23 You only have nine attempts at it.

24 But after the due date if you find that
25 you've made an error, the submission was incorrect or

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1 there is something critically wrong either in the
2 aggregate or in the death and injury, the system will
3 be locked out. You can't update your submission. You
4 have to send a coversheet through ODI explaining why
5 you need to update it, what the problem was. We
6 should probably agree with that but there may be
7 instances where we don't necessarily agree that an
8 update is necessary. At that time, the application
9 will be reopened and you can resubmit. In order to do
10 that after the due date, there has to be a coversheet
11 coming to ODI.

12 CHAIRMAN WEINSTEIN: I just want to
13 clarify one thing about that. We have said informally
14 and it's remained informal that to avoid overload on
15 the system, we are going to at least with major
16 manufacturers of both vehicles and equipment work
17 informally and try to schedule submissions so they
18 don't all come in on the afternoon of December 1st or
19 whatever the due date is because we don't want to take
20 the risk that could either overload our system or your
21 systems. Therefore some people's due date might
22 actually be December 4th informally. We're not going
23 to change the rule to say that but everyone will know
24 what their due date is. So when Jon is talking about
25 "the due date" it will be each company's due date as

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1 worked out with ODI. Is that right?

2 MR. WHITE: Except that when we start
3 locking down the system, that is the 30 days after or
4 60 in this case.

5 CHAIRMAN WEINSTEIN: Yes, we're probably
6 not going to lock the system down until one week after
7 the actual due date. The simple answer is if you need
8 to a change after you've submitted your information
9 whether your due date was December 1st, December 4th or
10 November 28th, you need to send a coverletter in to ODI
11 to let them know that you're revising it. Otherwise,
12 it would be too confusing. Basically if you see
13 something after you've done your submission, let us
14 know before you try to update it even though the
15 system technically might not be locked down for
16 another couple of days. Is that fair?

17 MR. WHITE: Let's move on to the aggregate
18 data. This is a schedule. It's in your handout
19 package there. The first quarter we're looking for
20 that to come in on December 1st. You have 60 days from
21 the end of the quarter. The quarter ends September
22 30th. So 60 days from that is December 1st, the first
23 non-holiday, non-weekend day.

24 The second quarter would be March 1, 2004.

25 The third report is due on June 1, 2004. Then the

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1 fourth report is back to the original way and that's
2 30 days. So that one will be coming in on July 30,
3 2004.

4 Historical reporting. I'll just mention a
5 word or two about the historical reports. We gave you
6 a handout in there. It's probably the last page.
7 It's a graphic on how that works. The production
8 starts from the third quarter of 1998 to whatever the
9 reporting period would be which starts with July 2000.

10 So you're going to report on whatever warranty claims
11 that come in on that particular period.

12 The next one keeps going and moving on
13 each quarter. Essentially they are going to give us
14 12 individual quarterly reports providing production
15 and warranty for each quarter. You use the templates
16 that we have on the website. Just don't fill in the
17 other fields.

18 CHAIRMAN WEINSTEIN: Just a comment, I
19 don't know how the tire industry works but the vehicle
20 industry always shuts down for two weeks around
21 Christmas and New Year's. We were asked. The way the
22 December 31st date got there was we just pushed back 30
23 days and we extended it. We really weren't focusing
24 on what that might have meant. We're probably going
25 to push that to January 15th just for convenience sake.

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1 So you don't have to cry at this meeting.

2 MR. WHITE: The big change there is with
3 the current quarter which you've been collecting all
4 the information for is now part of the historical
5 reporting. We dropped off that first historical
6 report quarter. I know you all know this but we don't
7 want the copies of the warranty claims that your
8 accounts are on but just the accounts. This will be
9 submitted electronically through the SFTP ("Secure
10 FTP").

11 Just to reiterate briefly, external
12 communications are five days after the end of the
13 month that they were issued or made available to the
14 dealers, distributors, manufacturers, purchasers,
15 owners. Foreign recalls five days within the
16 determination either by your company, foreign company
17 or the foreign government. Then the aggregates the
18 first report is due December 1st. A one-time
19 historical report is due December 31st.

20 If you go back to the manner of reporting,
21 these external communications in foreign recalls you
22 don't need a user ID for those. They come directly to
23 ODI. You can send them by mail and by e-mail. This
24 is giving a specific e-mail address for both external
25 communications and the foreign recalls. I think the

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1 regulation has this down as foreign_recalls. It's
2 really frecalls now. We've had problems with that.
3 The regulation has to check up with that.

4 The SFTP site, the secure site, that's for
5 the aggregate and for the rest of the industry field
6 reports. You're not involved with that. You need a
7 password. In your handouts there, we've given you
8 what are proposed. The current thinking is on file
9 naming conventions. It's one page. It should look
10 something like that.

11 Just briefly, the first six characters are
12 going to be your EWR ID which we'll give you. The
13 next one would be the single character and for report
14 category which in the case of tires is a T. And
15 report year this one is 03. The reporting quarter
16 starting with 3. The report version, each time you
17 submit and have been accepted with your version and
18 you'll get notified back by Artemis that it's been
19 accepted, you have to submit with a new version if
20 you're going to update it. Otherwise it will reject
21 it because the version number hasn't changed.

22 Report type aggregate or death/injury and
23 then the sequence number would be if you're going to
24 exceed more than one Excel workbook. So you would
25 need to use another one. It's more applicable to some

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1 of the other applications like field report
2 submissions where there could be multiple sequence
3 numbers for the way that file naming convention is.

4 When you submit your submission
5 electronically, there is a file name validation that
6 you've filed your report according to this convention,
7 that every one of these characters gets the right
8 version number. We're ready to go. We haven't gotten
9 your response before and it hasn't been accepted. The
10 first notice back from Artemis will say "We got you.
11 We've identified it. You've successfully met the file
12 validation requirements."

13 You will also be instructed that there
14 will be another one forthcoming where it would go
15 through the initial data to make sure that the data
16 within the spreadsheets, the aggregates, are correct.

17 It either meets the schema for XML if you're sending
18 it that way or in Excel that it meets our validation.

19 All the cells were filled in. There are no nulls.
20 Everything has a zero or more. The character
21 conventions if it's a year has a four digit year in
22 there. The right code for 73, 74, 72, 71 is all in
23 there. That's what that check is for. It doesn't
24 mean that we've looked at your data and made some
25 sense of it. It just simply means that the computer

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1 has accepted the data and it fits our criteria.

2 A note on the null cells and the empty
3 spaces. It may not occur on a tire but it could occur
4 with others. If in a particular field like warranty,
5 you have that 1999 Bullrider and the warranty claims
6 on it that there's nothing in that particular cell for
7 tread. Then that's a zero in there. That's where it
8 stands. It's not a null. You put a zero in there.

9 If on the other hand that 1999 Bullrider
10 you have no warranty and no property damage claims
11 then you can delete the whole line. There's no need
12 to put it in there. You need to tell us about it in
13 production. Production has to be a full set. That's
14 the master set but that line in the warranty and the
15 property damage spreadsheet can be deleted. That
16 follows through with any of the tire lines or any
17 other products.

18 CHAIRMAN WEINSTEIN: Or you can write
19 zero, zero, zero for each, tread, sidewall.

20 MR. WHITE: Whichever is easier. With
21 some manufacturers, there may be a lot of zeros in
22 their products. That's the final naming convention.

23 As far as user IDs go in order to get a
24 user ID, we have an EWR account application form that
25 we'll be making available on the web. It's basically

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1 a table. It will ask certain characteristics about
2 the company. Who the company is? Who you're
3 representing? So basically the divisions,
4 subsidiaries, things of that nature.

5 CHAIRMAN WEINSTEIN: Contact points.

6 MR. WHITE: Yes, the primary and secondary
7 contact points. It's also asking more generic
8 information such as when you started reporting for
9 taking responsibility for that company. In other
10 words if you acquired a subsidiary and now you're
11 reporting that within the last five years, that's
12 going to affect your EWR submissions. It's going to
13 affects somebody else's too if they're in that same
14 period. So we need to know about that.

15 It will go through the dates when that
16 started. The approximate annual population. It's not
17 applicable to tires but this is a generic form.

18 CHAIRMAN WEINSTEIN: When will it be
19 available.

20 MR. WHITE: It will be available on the
21 web probably next week or certainly by the end of the
22 month. We'll start accepting the applications in
23 July. We'll be recording all this information and
24 chasing it all down and confirming with you. Then in
25 August, we will start issuing out the user IDs. We'll

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1 give you your EWR ID, your EWR user account name
2 which you will use to submit over the SFTP and your
3 password. Others will use the public website.

4 The password will be a temporary password.

5 You'd have to go to the public website. There's a
6 secure sockets layer that we'll be using for that.
7 You plug in the user account name that we gave you and
8 the temporary password. Actually you select the
9 password on that. That's good for the next 90 days.
10 The next reporting quarter you'll have to go back and
11 change it with the same process and start again.

12 CHAIRMAN WEINSTEIN: Can you send the
13 password and the user name by e-mail?

14 MR. WHITE: Right now, we're going with
15 formal letter but by requirement we have it secured.

16 CHAIRMAN WEINSTEIN: Then I guess they're
17 going to have to have an address of the contact point
18 as well as an e-mail address for contact point.

19 MR. WHITE: That's part of the address.
20 When we have discussions and contacts with the
21 secondary contact, we'll be running a validation check
22 with them to make sure we have the right person. It's
23 up to the companies to keep us up to date on who their
24 primary and secondary contacts are. If the primary or
25 secondary contacts have left the company and we don't

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1 know about it, you're still going to pass our
2 validation then.

3 The validation at this point will involve
4 a number of questions. We'll ask you to pick one or
5 more questions and we'll record those questions.
6 Those are what you'll be selected up against. You'll
7 have to answer those each time.

8 Whenever we have a contact on a particular
9 issue and this company may want to use a third party,
10 the primary or secondary has to be present either on
11 the line or in the meeting or e-mail so that we have
12 some knowledge that we're talking to the right person.

13 Once we start doing passwords and if you happen to
14 forget a password, the process will be that you come
15 back to ODI. We would validate that you're the right
16 person to contact and we reissue and go through the
17 whole process all over again.

18 The last two points are after we get this
19 data and it's come in and everything's been accepted
20 and it's wonderful and we started reviewing, we start
21 seeing things that causes us either concern with how
22 the manufacturer filled out the numbers, where the
23 aggregates came from or you see things that might
24 indicate something in there where we would like
25 additional information, we will do what the working

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1 title right now is "Report Clarification." It
2 probably will be a letter. It'll be a request for
3 either clarification on the process, how those numbers
4 are filled in, or request for EWR related data.

5 We don't consider this to be an
6 investigation. It's strictly to understand what's
7 going on within those numbers. As you're aware, those
8 numbers cover a very broad area. They don't mean
9 anything but there's really a defect present in here
10 that has to be sorted through. That's what this
11 process is about.

12 CHAIRMAN WEINSTEIN: And you'll be sending
13 those to the EWR contact point, correct, not to the
14 place we send our standard investigatory information
15 request to. This goes without saying but each company
16 might want to have their "safety office" make sure
17 that they get forwarded on to the extent that the
18 questions may relate to an issue that it might
19 subsequently lead to a defect investigation.

20 MR. WHITE: Finally, in order to make it
21 easier for us and make it easier for the
22 manufacturers, we're working up an EWR compendium
23 which walks pretty much what I've gone through here
24 but in a lot more detail and with cross references and
25 definitions and sites and with examples of how to walk

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1 through this, what we're looking for in each one and
2 what our data validations are going to be so that it's
3 an easier time for everybody.

4 Because of the nature of that, it has to
5 go through a lot of layers within the Agency. So we
6 hope to get that out sometime early in July. We have
7 to generate a few different versions, one for each
8 reporting category. It might take awhile to get
9 through everybody. We hope to do that. We're well
10 along our way on it. It will involve more about the
11 electronic handling, file submissions, file naming as
12 well as the filling in of the data. That's that. Any
13 questions?

14 MR. RUTTER: Jon, on the user IDs and
15 passwords, several of us were involved in some of the
16 early reporting testing and may have already received
17 user IDs and passwords. Are those still valid or is
18 this going to be a new request for a user ID and
19 password?

20 MR. WHITE: The current thinking is that
21 the EWR ID you got will remain the same. Well, we're
22 going to change it because the format has changed.
23 It's now six characters long instead of four. But
24 your account number, account name and password is
25 invalid. We'll have to give you a new one.

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1 MS. BAULIG: My name is Laurie Baulig with
2 the law firm of Gurne Porter & Baulig. I'm here on
3 behalf of the Rubber Manufacturers Association
4 ("RMA"). I have several questions on behalf of the
5 entire manufacturers. I do certainly appreciate this
6 meeting. It's very helpful.

7 The first question goes back to your
8 briefing on updates and with respect specifically to
9 updating injury/fatality data. After the TIN becomes
10 available, after the close of the reporting period and
11 review date, could you walk us through the process of
12 how that information is updated? In particular, do
13 you update the entire field or do you just send in an
14 update for that particular incident?

15 MR. WHITE: That whole worksheet.

16 MS. BAULIG: All the fields?

17 MR. WHITE: Yes.

18 CHAIRMAN WEINSTEIN: The whole death and
19 injury worksheet after you've gotten concurrence or
20 approval or acknowledgment from ODI that you're going
21 to be doing this.

22 MR. WHITE: I should also note that we
23 won't allow you to delete a death or injury incident.
24 If you find that it really didn't occur and want to
25 scrub that, there is no deletion after the closing.

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1 Okay?

2 MS. BAULIG: At the meeting with Volpe
3 earlier this year, RMA received information that tire
4 manufacturers are no longer required to report the
5 tire type code on the template for production. But
6 both the final rule and reporting template still have
7 tire type code. Could you clarify that issue since
8 they received this information?

9 MR. WHITE: Well, Volpe doesn't speak for
10 the Agency. That's the simple answer to that if it's
11 still in the requirements.

12 CHAIRMAN WEINSTEIN: What's the tire type
13 code? Do you mean like LT or V? What does that mean?

14 MR. WHITE: No, it's part of the TIN.

15 MR. RUTTER: It's the third grouping of
16 tire codes in the TIN.

17 CHAIRMAN WEINSTEIN: Is it a problem?

18 MS. BAULIG: Well, if you're already
19 getting the TIN, do you really need that?

20 CHAIRMAN WEINSTEIN: Are you talking about
21 on the death and injury report? We're not getting the
22 TIN on the cumulative reports.

23 MS. BAULIG: It's part of the production
24 reporting.

25 CHAIRMAN WEINSTEIN: Production reporting.

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1 We don't get a full TIN on a production report
2 either.

3 MR. WHITE: It's still in there. It's
4 part of the requirements for production.

5 CHAIRMAN WEINSTEIN: If the industry
6 doesn't like it, they can ask us to change it. But
7 for the moment, it's in there.

8 AUDIENCE MEMBER: Originally we understood
9 that it was the third grouping in the serial code.
10 Then there was talk that it was going to be passenger,
11 light truck or motorcycles.

12 MR. WHITE: Yes. The tire reporting is
13 strictly for passenger car, light truck and
14 motorcycles. It has to be for your tires more than
15 15,000 in a single tire line. It can't be for tires
16 they use for 12 inches or less, the artificial spares
17 and those things. It has to be a regular highway
18 tire.

19 CHAIRMAN WEINSTEIN: By the way while
20 we're at it, what we expect is that a company that
21 anticipates producing 15,000 annually should start
22 reporting that in the first quarter. Don't wait until
23 you have 15,000. Let's say they made 6,000 each
24 quarter then we expect that to be reported in the
25 first quarter if the company in good faith expects

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1 there to be 15,000 in a year. Don't wait until the
2 third quarter when you've cumulatively gotten over
3 15,000. Even though that production number in that
4 quarter the way we've put it in production may be less
5 than 15,000. We want that reported, right?

6 MR. WHITE: Yes.

7 MS. BAULIG: Another one. In the event
8 the manufacturer does not possess the information
9 called for in the template, a question came up. How
10 should they make that entry seeing UNK or UN for
11 unknown? In other words, if the information may exist
12 and it's not zero but if it's not known to the
13 manufacturer, how should that be made?

14 MR. WHITE: In the death and injury?

15 MS. BAULIG: I think probably in any
16 input.

17 MR. RUTTER: There was some discrepancy in
18 the Volpe meeting and the documentation that we had.
19 It was defined to enter that as UNK. In Notice 5 I
20 believe there was a reference to just entering it as a
21 U.

22 MR. WHITE: The regulation is gospel.
23 That's where we're starting from. We have a gazillion
24 rules on each one of them. You'll see that more
25 clearly. I can't address that right now but the short

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1 answer is the regulation is the answer to that.

2 CHAIRMAN WEINSTEIN: Do you mean like the
3 make, model of the vehicle for example? There is
4 obviously a vehicle but you don't know it. The
5 question is do you put U or UNK.

6 MR. WHITE: It would be simplest to put U.

7 AUDIENCE MEMBER: That's what the
8 regulation says. The regulation says U for
9 motorcycles and UNK or something for the rest of them.
10 We need that clarified.

11 CHAIRMAN WEINSTEIN: Well, somebody should
12 put that in writing and ask us to do it and we'll then
13 do it. We'll have a transcript of this meeting.

14 MR. VINSON: We require U for tires under
15 production information.

16 MS. BAULIG: When would you expect to get
17 back to the individual manufacturers requiring the
18 trial run data?

19 MR. WHITE: I wasn't handling that. I
20 thought we had gotten back to everyone who
21 participated. For the Volpe people who were there,
22 the exercise was really to see how they can transfer
23 and whether there were any transfer problems getting
24 to the system. The data system itself was a secondary
25 issue. We had not done anything of substance with the

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1 data. A lot of the data coming in was artificial.
2 You should have heard back from us on whether it was
3 successfully received or not. There should have been
4 a notice going back in each case.

5 MR. RUTTER: Yes, we got that.

6 MR. WHITE: Okay.

7 MS. BAULIG: Thank you very much.

8 MR. WHITE: Any other questions?

9 MR. LEVINSON: Bruce Levinson, The Center
10 for Regulatory Effectiveness. OMB in their terms of
11 clearance granting NHTSA authorization to collect
12 their data reiterated the Agency's statement that it
13 has "reviewed the relevant procedures for the
14 collection and analysis of the subject information and
15 believes the information in question will meet the
16 requirements of the Data Quality Act guidelines of OMB
17 and DOT. This expectation will be confirmed by the
18 Agency in the course of its preexamination per the
19 guidelines." What specific tests and criteria will
20 the Agency compare upon whether the early warning
21 collection and analysis complies with the Data Quality
22 Act guidelines? Also how and when will the Agency
23 make public the results of the data quality?

24 CHAIRMAN WEINSTEIN: He doesn't know and
25 the lawyers will answer that in due course. This is

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1 not the forum for that inquiry. We do remain
2 committed to assuring that any dissemination that we
3 make will meet the Data Quality guidelines. More than
4 that, I'll just leave it at that. If you have more
5 specific issues, you should address that to the Chief
6 Counsel's office.

7 MR. GRUENHOLZ: Tom Gruenholz, Michelin.
8 A question on the production threshold of 15,000. If
9 you do not know early in the first two quarters that
10 you're going to reach 15,000 a year, the first quarter
11 your production suddenly jumps and you see clearly
12 that you're going to reach 15,000 but you have
13 reporting for the first two quarters, how do you
14 report those first two quarters?

15 MR. WHITE: It starts with the quarter you
16 picked it up in such as the third quarter.

17 MR. GRUENHOLZ: So you would not report
18 those first two quarters.

19 MR. WHITE: No.

20 CHAIRMAN WEINSTEIN: Death and injuries
21 you should be reporting anyway because the 15,000
22 doesn't apply to that.

23 MR. WHITE: And once you're in with that
24 tire, it's good for two years.

25 CHAIRMAN WEINSTEIN: Yes, if you had

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1 15,000 in one year, you have to keep reporting the
2 next year even if you only anticipate making 11,000
3 for the next two years.

4 MR. WHITE: Yes, sir.

5 MR. MURPHY: Paul Murphy, Monaco Coach
6 Industries. I have three questions on this point.
7 One is on something you said. If you put your
8 quarterly report and sometime later on there's
9 discovery of an error on death and injury and
10 obviously you have it misrepresented in your data, how
11 is that corrected to put in the correct number?

12 MR. WHITE: You mean with respect to
13 deletion?

14 MR. MURPHY: I'm saying that we put data
15 together and for some reason we reported under death
16 and injury criteria, that somebody was injured or
17 killed and then it turned out that it wasn't related
18 to our particular data or whatever. Therefore we
19 reported erroneously and you're saying the
20 misrepresented data can't be corrected.

21 MR. WHITE: The reason for that is because
22 this is early warning. Nothing's an indictment here.
23 When we get a report like that, we're not going to
24 open up anything from the EWR data. There's no
25 investigation open from it and before we do anything,

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1 our first step is to go back to you for clarification
2 on it to find out what exactly happened in this thing.

3 We need a lot more information on that particular
4 death or injury report than just what's provided there
5 if we're going to start any proceedings or anything.

6 In fact, we have a whole procedure set up
7 for every report of fatality. We will be chasing down
8 every instance of fatalities so you will hear from us
9 on those. We'll get the clarification on it. So if
10 there are some changes on it, you can change it with
11 us because we're going to be tracking each one of
12 those. It won't be changed inside. We're not asking
13 you to change the inside.

14 If you find out that the person claimed
15 injury and to the best of your knowledge, it was a
16 banged head or something. Then you find out later in
17 the context of it that he died, we're not expecting
18 you to go back and change the report to say there's a
19 fatality now.

20 Similarly, if you find out that there
21 really was no injury but the allegation that you
22 received originally was an injury, this is early
23 warning. We don't expect you do a lot of in-depth
24 analysis on this stuff. It's just what you know at
25 the time and that's it.

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1 CHAIRMAN WEINSTEIN: That's right. If
2 someone makes a claim that they were injured and in
3 your analysis you send out somebody and then you find
4 out that the person really wasn't injured, the point
5 is that they claimed they were injured. That's what
6 we're talking about. Claims, not factual precision or
7 accuracy. They claimed the tread came off. You put
8 down tread separation. When you look at the tire and
9 you find out it's a bead problem, that's between you
10 and the claimant but the claim was that it was tread
11 separation.

12 MR. WHITE: You will find in the preamble
13 that we've put a lot of discussion over injury and
14 categorizing injuries. Try to stay away from that and
15 keep it as simple as possible. Did you have
16 additional questions?

17 MR. MURPHY: Yes, my second question deals
18 with vehicle manufacturers and the collection of data.
19 The warranty and so on is mostly taken care by the
20 tire manufacturers. Are we also expected to be
21 submitting EWRs relating to tires even though our data
22 may be somewhat difficult to gather? We do have a
23 division that sells tires, but I'm curious from the
24 manufacturing side how we deal with event rates.

25 MR. WHITE: The tire information that you

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1 as a manufacturer is expected to report is not the
2 tire. Anything to do with the quality of the tire
3 when the tire was being provided to you is being
4 carried out by the tire manufacturer.

5 CHAIRMAN WEINSTEIN: That's going to be
6 covered at the meeting dealing with vehicle
7 manufacturers which is tomorrow.

8 MR. WHITE: But you'd be reporting on
9 things like if you installed a perfectly good tire on
10 the wheel and in the process the machine tore it up.
11 That's the kind of incident you'd be reporting. Or if
12 there was a tire valve problem and causing deflation,
13 those are the incidents that we're asking the vehicle
14 manufacturers to report on tires. That's why it's in
15 there.

16 CHAIRMAN WEINSTEIN: Or even if the
17 vehicle rolled over after a tire failed and you're a
18 vehicle manufacturer and the person files a lawsuit
19 saying that the tire failed and your vehicle rolled
20 over and killed me, that would be clicked off as tire.
21 That's not this meeting though. Those are vehicle
22 manufacturer reports.

23 MR. MURPHY: Okay. Well actually that
24 leads to my next question. Is data collection also
25 data collected through the manufacturing process and

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1 therefore it's through creation collected post
2 delivery to the point of purchase?

3 MR. WHITE: EWR begins after it gets out
4 of the plant. We're not asking you to report on
5 internal operations within the plant.

6 CHAIRMAN WEINSTEIN: Quality control would
7 handle that.

8 MR. WHITE: Yes, sir.

9 MR. RUTTER: George Rutter, Continental
10 Tire. You mentioned during your discussion that some
11 of the validation that's going to happen between the
12 tire line reported on a death and injury form matching
13 the product data that would be reported in production.

14 But it is possible that we could be reporting a death
15 and injury for example for a tire that we did not
16 produce. That tire could have come in on an import
17 vehicle but it just happens to be that it is a tire
18 that we represent in the U.S.

19 I'm thinking there could be an opportunity
20 that you're reporting a tire and have no production.
21 Therefore you wouldn't be able to validate it and
22 you're indicating that it would kick out as an invalid
23 submission.

24 MR. WHITE: It would right now. That is a
25 consideration. That issue has come up before and

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1 there may have to be an exception for the tires
2 because that's obviously going to be an issue. That
3 will change our validation on that. Good point.
4 Anybody else?

5 AUDIENCE MEMBER: (Inaudible.)

6 CHAIRMAN WEINSTEIN: Would you speak up a
7 little louder so the court reporter can hear?

8 COURT REPORTER: I won't be able to hear
9 that.

10 MR. WHITE: You want information on the
11 secure SFTP?

12 AUDIENCE MEMBER: That's correct.

13 MR. WHITE: We're not going to address
14 that here. We intend to have another session to go
15 over exactly the transfer protocols issues, the IT
16 concerns as we get closer. It will probably be in mid
17 to late August. It's on your schedule. I wouldn't be
18 the one to answer that anymore.

19 CHAIRMAN WEINSTEIN: Do we have anyone
20 back there that can answer that now?

21 MR. WHITE: Or wants to? Frank, why don't
22 you come up? You can go to the contact sheet. Those
23 are the questions that you can go to Volpe and
24 Artemis. They take care of our SFTP sites. If you
25 have transfer issues, that's the contact probably by

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1 either the phone or the e-mail address. They will be
2 doing that presentation in August.

3 CHAIRMAN WEINSTEIN: This is Frank Borris
4 who is the program manager for Artemis.

5 MR. BORRIS: Good morning. I heard some
6 mention earlier about the manufacturer's test
7 submission process and wanting to get feedback from
8 that. That information has been compiled and will be
9 available on ODI's website. I would expect that to
10 sometime in the August timeframe. In the meantime,
11 you can call the Artemis Helpdesk at 617-374-2776 and
12 get some initial guidance on what you need to know
13 about Secure FTP.

14 I can tell you that out of the
15 approximately 20 manufacturers that participated in
16 the test submission process in general about one-third
17 got through in one shot with virtually no help from
18 the Helpdesk. Another one-third needed some minor
19 handholding to get their data into our system. There
20 was another one-third that it seemed like no matter
21 how hard we helped them their issue was not actually
22 accessibility to our FTP site. It was actually
23 getting out of their own firewall. We do have people
24 on staff who were very instrumental in helping getting
25 the systems configured properly to get out of their

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1 firewall and into our system. But we had virtually
2 zero problems on our end. They were all client based.

3 MR. WHITE: The contact for the Artemis
4 Helpdesk is in the listing we gave you. Any others?
5 Thank you for coming.

6 CHAIRMAN WEINSTEIN: Thank you very much.
7 We're going to be doing other meetings. For those
8 who are interested in more than just tires, we're
9 going to be doing child seats and other equipment this
10 afternoon. Light vehicles are tomorrow morning or
11 tomorrow afternoon?

12 MR. WHITE: Light vehicles are first thing
13 in the morning at 9:30 a.m. tomorrow. All the other
14 vehicles are tomorrow starting at 1:00 p.m.

15 CHAIRMAN WEINSTEIN: Thank you. Off the
16 record.

17 (Whereupon, the above-entitled matter was
18 concluded at 10:35 a.m.)
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23

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A-F-T-E-R-N-O-O-N S-E-S-S-I-O-N

1:05 p.m.

CHAIRMAN WEINSTEIN: On the record. All right. Let's get started. If there are stragglers, they'll catch up. There is a transcript being made of this meeting so they'll be able to catch up if they miss anything.

My name is Ken Weinstein. I'm the Associate Administrator for Enforcement with NHTSA. Up here at the table with me is Jon White, head of the Defects Assessment Division, Taylor Vinson, Chief Counsel's Office and Bob Squire who works with Jon. Thank you all for coming.

As you all know, the TREAD in November 2000 authorized and directed NHTSA to issue early warning regulations which require manufacturers to submit data that will help the Agency to identify potential safety defects so that we can start investigating them in a prompt fashion. We met the targets of that statute, the command actually for when we had to get our regulations out.

Last July we put out final rules implementing the early warning provisions. We've issued two notices in response to petitions for reconsideration that had been filed, one in April

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1 which we in shorthand called Notice 4 because that's
2 the way the Federal Register identifies it and then
3 one just last week called Notice 5 which dealt with a
4 number of other issues.

5 We then have also extended the original
6 effective reporting dates. It's a little subtle but
7 basically we pushed everything back three months. The
8 first reporting quarter will generally be the third
9 quarter of 2003 rather than the second quarter of
10 2003. Certain other adjustments were also made in the
11 dates when materials are to be submitted.

12 We've convened this meeting as well as
13 three others dealing with other portions of the
14 vehicle and equipment industry primarily to present
15 some information about what manufacturer
16 responsibilities are and to answer questions. Jon
17 White will give a presentation consistent with the
18 handout you've gotten. Then we'll be available to
19 answer questions.

20 Primarily the questions we hope will be
21 mostly "How to" questions dealing with the mechanisms
22 as opposed to substantive questions like "What's the
23 definition of a field report" or something like that.

24 We'll do our best to answer whatever we can answer.
25 As I cautioned at an earlier public meeting we had,

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1 any interpretative questions announced here are
2 advisory. They are not official. They do not bind
3 the Agency. A long standing practice is if somebody
4 wants an interpretation on a regulation they must
5 submit the request in writing to our Chief Counsel's
6 Office and we'll do a good job of turning them around
7 as quickly as possible.

8 The other thing I wanted to mention is we
9 have already issued a number of interpretations of
10 various provisions of our regulations. They have been
11 collected at a location that's available on our
12 website. You get into the NHTSA website and then go
13 to the ODI portion of that site. Jon has assured me
14 that it's pretty self-explanatory.

15 Look for EWR for Early Warning Reporting
16 interpretations. For those who haven't seen those,
17 we've issued a number of interpretations dealing with
18 some very important issues. I recommend you take a
19 look at those. With that, Jon.

20 MR. WHITE: Good morning.

21 CHAIRMAN WEINSTEIN: Good afternoon.
22 First Correction.

23 MR. WHITE: Not having a good day. All
24 right. As Ken said, my name is Jon White with the
25 Defects Assessment Division. I'll be going over here

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1 the regulations and the recent changes, including the
2 schedule changes, templates, the manner of reporting,
3 the user ID management, how we're going to do that and
4 then some follow-up stuff that we'll be doing with
5 this thing currently known as report clarification and
6 then the guide that we'll be putting out later on, the
7 compendium.

8 Part 579 is Subpart A. It starts off with
9 the terminology and general administrative functions.

10 We've all gone through that. In the recent
11 regulations, we've added two more new requirements,
12 one's for the child seat which is handles and the
13 other one is control which pertains to all
14 manufacturers. There are a number of other terms that
15 have been modified and jinked around. You might want
16 to take a look at those. They'll be in the Notice 5
17 which came out June 11th.

18 Also contained in there under Part 579.5
19 is External Communications. Paragraph A is the same
20 one that's been there since the Agency started under
21 573.8. It's the reporting of the service bulletins
22 that have gone out to more than one manufacturer,
23 dealer, distributor, owner, purchaser. That's
24 submitted monthly, five days within the end of the
25 month.

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1 In addition to that, we've added to that
2 the reporting of recalls, consumer advisories,
3 customer satisfaction campaigns, anything of that like
4 that's going to involve either replacement or repair
5 of an item of equipment. That particular section
6 takes place on July 1, 2003.

7 CHAIRMAN WEINSTEIN: It goes into effect.

8 MR. WHITE: Goes in effect, yes. The
9 reporting of the service bulletins is still in play.
10 Subpart B pertains to foreign recall reporting. If
11 you are the manufacturer in this country or an
12 importer and you have a product in a foreign country
13 and it is substantially similar to one sold, meant for
14 sale, imported in this country and you're recalling
15 it, then you have to report it to us within five days.

16 That's five days within the determination of the
17 company's need to do a recall or the time that the
18 foreign government might order you to do that recall.

19 The content of that foreign recall report
20 will be substantially the same as what we have for
21 safety recalls. You must identify the manufacturer of
22 the product that's being recalled and make sure of the
23 defect of compliance. In addition to that, you have
24 to identify the substantially similar product in this
25 country and what foreign countries the campaign is

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1 being conducted in.

2 In Subpart C, this is what everybody
3 refers to as "Early Warning." That's the quarterly
4 reporting of production, warranty, consumer complaints
5 and field reports. The quarterly report is due 30
6 days from the end of each calendar quarter. The first
7 reports are due 60 days after the end of the quarter
8 for the next three calendar quarters. It will mean
9 for 2003 and the first quarter of 2004. We'll come up
10 with a schedule on that. It's on your handouts and
11 we'll also go over it here.

12 The production and aggregate data, you can
13 submit that electronically over the Secure FTP. If
14 you are only reporting deaths and injuries, there will
15 be a template available on the website that you can go
16 through and enter the data there directly without
17 going through the SFTP.

18 CHAIRMAN WEINSTEIN: That's primarily for
19 other equipments' manufacturers, not the child seat
20 folks who only have to report death notices and claims
21 of deaths.

22 MR. WHITE: The reason it's presented in
23 this order with production and aggregate and we're
24 talking about fatality later is we split those into
25 two different workbooks. You must submit the products

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1 and aggregate first. Then the death and injury one
2 comes next. We're going to go over the templates so
3 I'll just go through the reason for that at that time.

4 Non-dealer reports, we pushed that back.
5 The first reporting collection of field reports is for
6 the first quarter of 2004. That will be due 30 days
7 after you submit the aggregates. In this case, it'll
8 be in July which we'll get to that one. The schedule.
9 These are the templates.

10 CHAIRMAN WEINSTEIN: I'll just mention
11 that the reason why we pushed field reports away from
12 the same time of reporting because we know there's a
13 lot of bandwidth going to be used. We wanted to avoid
14 possibilities of clogging either our systems or the
15 manufacturers' systems. We staggered the reporting of
16 production and aggregated data on the one hand and the
17 copies of field reports on the other hand.

18 MR. WHITE: This is the first page of the
19 child restraint system template. It needs to be
20 filled out each one. It's been the same one. I would
21 like to note here that this is a new template series.
22 It will be 1.2. You probably have 1.1 or maybe even
23 1.0. This new template should be out next week and on
24 the web.

25 To clarify it, the type codes are provided

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1 there. There is infant carrier and rear infant
2 carrier booster seat and other. The codes are in
3 there for that. The production, we're going to match
4 it with the make, model and production year.

5 It's important these three are filled in
6 correctly because whatever you submit in terms of
7 warranty and field reports or in your death and
8 injury, that's what we're going to compare it up
9 against. If it doesn't exist in this table here, it's
10 going to be rejected during our validation series. An
11 example of that is you have a 1999 Bullrider and you
12 report it in your production table but then in your
13 death and injury, you go to the exact custom model of
14 that and it's the 1999 Bullrider Babysmooth. That
15 would be rejected because it's not the same as what's
16 in the production table. So it needs to be exactly
17 the same in order to pass validation or the whole
18 thing will be rejected and kicked back.

19 This is an example of the aggregate
20 worksheet. This is complaints and warranty claims.
21 In there is the make, model, model year. It's
22 actually your minimal specificity requirements matched
23 up with the reporting requirements, the compliment
24 codes that are acceptable.

25 Death and injury is a separate workbook.

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1 It comes in after or at the same time as the product
2 one but we'll validate the product first. The same
3 information is filed on that. Again it's Version 1, 2
4 or later.

5 This make, model, production year, again
6 has to be the same as what's provided in the
7 production one. If you're reporting a foreign death
8 with your child seat or add-on equipment, you have to
9 report the substantially similar U.S. product here
10 even if it's not the right one.

11 CHAIRMAN WEINSTEIN: The point there is
12 don't use the foreign name. If a different name was
13 used in France, the French name, when you're reporting
14 it to us, put in the name of the U.S. product to which
15 it's substantially similar because otherwise we won't
16 have anyway of knowing. We don't want you to submit
17 two reports. Just submit it with the name of the U.S.
18 product. If there is more than one product, just pick
19 one.

20 MR. WHITE: Pick one. That's right.

21 CHAIRMAN WEINSTEIN: Any one or the most
22 similar to the extent that there are several of your
23 domestic models that are similar. Pick the one that
24 seems to be most similar.

25 MR. WHITE: So we'll pick up that it's a

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1 foreign country incident when we get down to state and
2 country. The incident date is a calendar year. In
3 the context of the state or foreign country, if
4 there's a U.S. state or territory, use the two
5 character U.S. Postal Code. We'll have on the
6 website. I think it's already there. You can get it
7 from the Post Office. It's just the standard ones
8 that everyone uses.

9 If it's a foreign country, you must write
10 it out in text, no abbreviations. It's full text.
11 We're not going to validate on whether you picked the
12 most recent one or whether it fits U.N. designation or
13 whatever. Just write whatever it is and we'll know
14 from that it's a foreign country.

15 CHAIRMAN WEINSTEIN: Jon, I want to ask
16 you something. When it says "incident date" that's
17 the full date, right? Month, day and year.

18 MR. WHITE: Yes.

19 CHAIRMAN WEINSTEIN: Month, day and year.
20 Six digits, right? Is that how we want it done?

21 MR. WHITE: Yes. Exactly. I jumped over
22 this one. We got a number of questions on the IDs.
23 We've changed that on the next version of these things
24 that will be out next week. It'll be called "Sequence
25 ID." It's a row ID. For every incident that you're

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1 going to report to us under death and injury, it
2 starts with one and keeps going.

3 The manufacturer unique ID, the next one
4 to it, that's yours. You can code it anyway you want.

5 We're not going to validate against that one. That's
6 one of the few fields that can be null. That's yours.

7 It can be a file name. It can be anything. The only
8 requirement is that if you have more than one entry
9 for reporting quarter, it has to be unique. Each one
10 has to be unique. It can't be the same one again.

11 The components code, put that there.
12 We're going to start with SysCompA. If SysCompA is
13 blank, it will be rejected. It has to be something in
14 SysCompA. It has to be one of the reporting codes
15 that are acceptable for child seats. The equipment is
16 separate. It can be a 99 or 98 but only if there's
17 nothing else in there. If you want a non-98, 99 in
18 here, it exists. If you don't know what the component
19 is, it's a 99 and that's it.

20 CHAIRMAN WEINSTEIN: I think maybe you
21 ought to start over and go back a little bit, Jon.

22 MR. WHITE: Okay.

23 CHAIRMAN WEINSTEIN: Ninety-nine reflects
24 if you have a claim of a death and they don't identify
25 which component of the say child seat for the moment

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1 was allegedly responsible for the problem. So you put
2 99 because nothing was stated. Ninety-eight means
3 they stated something but it's not one of the seat
4 shell, handle, one of the four specified items for
5 child seats. So you can't have one of the specified
6 ones plus a 99 because by definition you wouldn't be
7 writing 99. But you could have handle and a 98
8 because they might claim that something else is wrong
9 that isn't subsumed within one of our four categories.

10 What Jon was saying is that you have to
11 start with the lowest number you have and the first
12 thing would be in under A being the first thing that
13 they claim is wrong. If they say the shell failed and
14 the handle failed and the buckle failed, then you
15 would write each of those three systems in that
16 category J, K and L, I guess it is, System Comp A,
17 System Comp B, System Comp C.

18 MR. WHITE: We're not asking you to make a
19 judgment over which one's the most severe, nothing
20 like that. Just whatever is the first non-blank and
21 not 98 or 99. Erica.

22 MS. JONES: Going back to the incident
23 number sequentially, is that a running sequential so
24 that the next quarter you pick up with seven or eight
25 or do you start over with one each time?

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1 MR. WHITE: You start over with one. It's
2 only for the quarter and it's tied together with the
3 manufacturer's whole file name that goes with it which
4 we'll get to in a minute or two.

5 AUDIENCE MEMBER: Do you have any plans to
6 have on your website one of these filled out with
7 sample data?

8 MR. WHITE: It's going to be a compendium.
9 We'll put that on the website but it will be going to
10 each manufacturer as to how it's all going to work.
11 These are the specific reporting dates. We've given
12 that to you in the handouts. Sixty days for the first
13 three quarters. The first one is due on December 1st
14 and then March 1, 2004, June 1, 2004. Then the fourth
15 report will now be 30 days and that will be July 30th.

16 CHAIRMAN WEINSTEIN: One other thing. To
17 avoid overwhelming our system and the manufacturers'
18 systems, we intend informally to work with especially
19 the larger manufacturers to phase their data over a
20 week or two week period so we might ask somebody to
21 submit a couple of days early if they assume they can
22 and let other people do a couple of days late. We're
23 not going to change the Federal Register due date but
24 we don't want everything coming in on the afternoon
25 of December 1st. We're going to do that with the whole

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1 vehicle and equipment industry.

2 MR. WHITE: One of the points I meant to
3 go over when we were doing the aggregates is that when
4 you're doing the warranty and production and you have
5 the 1999 Bullrider again and you have in the warranty
6 for the handle no complaints in there, you don't leave
7 that blank. It has to be a zero. We're looking for
8 the number zero in each one where there's no data to
9 report. If you find that you have an entire row, in
10 other words for that 1999 Bullrider, and you have no
11 complaints against it for the handle, for the shell
12 for the buckle and restraint, then you have a choice
13 of either putting in zeros all the way across that or
14 deleting that out of that particular template, the
15 warranty and the field report counts. You must
16 provide it in production even so. The production is
17 the master. You need to have a full set of whatever
18 you produce during the reporting period.

19 The hard copy we kicked that back to 30
20 days after the final due date. We're not going to
21 start collecting that from you until January 2004 to
22 March. It will be due on July 1st, the first one.

23 CHAIRMAN WEINSTEIN: The hard copy. It
24 will be coming electronically. We hope they will come
25 in electronically but we get sloppy sometimes and call

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1 them hard copies but we mean just copies.

2 MR. WHITE: Yes, with respect to field
3 reports, the standards we're accepting on that some
4 people have asked for that. It's .pdf, .tif, .txt,
5 MSWord .doc and Rich Text .rtf. We'll also accept the
6 .jpeg. Those are the only acceptables for field
7 reports electronic formats so far.

8 AUDIENCE MEMBER: Can you say that again?

9 MR. WHITE: I think it's in the handouts
10 but it's Adobe .pdf, .tif, .txt, Word .doc, Rich Text
11 .rtf or .jpeg. Now as Ken suggested, we'll accept
12 them in hard copy. We'll accept them electronically.
13 There will be a file name in convention with that.

14 Now is as good a time as any to go over
15 the file naming. When you submit your report
16 electronically to us, it has to meet a file naming
17 convention. That's our first validation. It's in the
18 handout pages. There are two of them. It will go
19 like this. Basically it's going to walk through the
20 first six. In our original test if any of you were
21 part of the test group, it was only four character
22 manufacturer ID. Now it's a six character.

23 In the reporting category, it's two
24 character report year, one character report quarter
25 varying from one to four and then our report version

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1 which in this case is three characters. Each time you
2 submit to us and it's an accepted submission that's
3 one. The next one that comes in since you've already
4 accepted one so you have to change it to a new version
5 number, the next one up, or it's going to get rejected
6 or compared with what you've already submitted and
7 it's the same, it gets rejected. If it's two higher,
8 it gets rejected again. It has to be one up.

9 CHAIRMAN WEINSTEIN: We start with one
10 each quarter.

11 MR. WHITE: Yes, for the quarter but then
12 it's incremented. Then the report type and there's a
13 listing of the report types on there. Basically
14 aggregate data, death and injury or field report.
15 Then a sequence number. The sequence number in this
16 case for aggregates would mean that you've exceeded
17 the size of an Excel spreadsheet and you need a new
18 sequence to go on to the next book. That's what that
19 means. It probably won't be done but it's primarily
20 used for something like field reports for some of the
21 motor vehicle manufacturers. They may have a lot of
22 them for whatever.

23 The other page which goes over the field
24 report filing convention has gotten complicated. If
25 you tokenize it, it's broken out here and it's more or

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1 less straight forward. The first character is for a
2 single model, single platform. Child seats would not
3 use a platform. They will be using a model so that
4 would be the designate there. Then the name of the
5 model. Then the model year range, that's going to be
6 from 2000 to 2004. It's whatever the product is
7 applicable, the subject is. Then the subject
8 component codes are going to listed. Then the
9 sequence numbers.

10 It's conceivable that you could have one
11 field report with this particular model and this
12 particular range and you would still be talking about
13 the handle on the second report or third report. It's
14 whatever came during the quarter. The other
15 parameters that are there are just to account for
16 additions to it or multiple submissions.

17 CHAIRMAN WEINSTEIN: Jon, could I ask
18 because somebody else will ask if I don't? For this
19 sequence number, you said it varies and that's just
20 the sequence that came in that quarter up to five
21 characters. Is that right or does it have to have
22 five characters? So it would be 00001. The next one
23 would be 00002, etc.

24 MR. WHITE: The way it's currently set up
25 it has to be the five. It's just going to be in

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1 there.

2 CHAIRMAN WEINSTEIN: So what shouldn't be
3 varied? It's always going to be five characters.

4 MR. WHITE: Yes.

5 CHAIRMAN WEINSTEIN: Oh, the character
6 position may vary depending what happened before but
7 there always has to be five characters.

8 MR. WHITE: Yes. These two less this one
9 but the field report filing naming, we're not really
10 whetted to this. So if there is some input, some
11 concerns, some better ideas on how to do this, we're
12 receptive to it. This was our best way of getting to
13 the information to do it automated in a simplified
14 fashion.

15 The rub is that whether you're submitting
16 a field report electronically or in hard copy it has
17 to have this file name. Our only validation on our
18 field reports is this file name.

19 CHAIRMAN WEINSTEIN: The point of this is
20 not to be overly complicated and not to put burden on
21 the industry but was to assure that our folks in
22 looking at field reports could identify what they were
23 about. Let's say we start looking at a handle of a
24 particular child seat. We need to be able to look and
25 see whether that manufacturer had submitted field

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1 reports or whether there were field reports about that
2 handle on that model. If they just came in a big
3 pile, it would be very difficult. We would have to be
4 leafing through every time. We needed this or
5 something like it.

6 As Jon said if someone has a much better
7 idea, please let us know as soon as possible and then
8 maybe we'll adopt it hopefully before you have to
9 start coding these things for the first quarter of
10 2004. So there is more time for this one.

11 MR. WHITE: This took a lot of time for us
12 to come this far on it. We realized we had developed
13 an albatross but we couldn't come up with a better way
14 of doing it that would allow us to mass process all
15 this data coming in.

16 CHAIRMAN WEINSTEIN: Not albatross. It's
17 an appropriate resolution of a difficult issue.

18 MR. WHITE: Yes. In the manner of
19 reporting, the external communications, service
20 bulletins and campaigns can be either sent to us in
21 hard copy mailed directly or e-mailed. We have a list
22 of contacts on that. The e-mail address for external
23 communications tsb@nhtsa.dot.gov. That should be in
24 your contacts and that's where those should go if
25 you're going to submit them electronically. They do

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1 not get submitted over the SFTP with the user ID. It
2 will rejected.

3 Similarly the foreign recalls are
4 submitted the same way. They are mailed in or e-
5 mailed. The e-mail account for that one is frecalls.

6 I think we have it in the regulation as
7 foreign_recalls. We need to clean that up. That
8 doesn't work. We've had problems with that so it's
9 frecalls. That's in the handout as well.

10 The aggregate, quarterly reporting and the
11 one-time historical report and the field report
12 submissions you're going to submit through the SFTP if
13 you choose. Those all require user IDs and passwords.

14 The user ID I know a number of you have
15 already submitted for that. You're going to have to
16 fill out what we call an "EWR account application
17 form." Essentially it's an Excel spreadsheet. It
18 will walk you through and ask you the manufacturer
19 name and address, the principal and secondary
20 contacts, their e-mails and addresses if it's
21 different. It will also ask a qualification scheme
22 which we'll get to later.

23 Then it asks things like what's the
24 product that you're representing, the population. If
25 you are representing other divisions or brands other

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1 than what's listed as the manufacturer, we would want
2 a list of those so we'd know who's accounting for
3 what. If these particular brands you've required them
4 over the reporting period from July 1998, we would
5 want to know about those so we'd know there's a gap
6 and to expect that.

7 There will be some other information.
8 Some of it is specific to different pieces of the
9 industry. This form is going to be generic. We'll
10 put it out on the web shortly. We'll mail it out to
11 anyone on request or e-mail, either way. But you have
12 to have that filled out and back to us before we'll
13 assign a valid user ID. Yes, sir.

14 AUDIENCE MEMBER: Primary and secondary
15 contacts as referred to would those executives
16 responsible for safety or warranty issues for the
17 company or would those be IT type people?

18 MR. WHITE: Preferably at least one of
19 them would be in that regard.

20 CHAIRMAN WEINSTEIN: You mean an IT
21 person.

22 MR. WHITE: Yes. We're not going to
23 monitor that. We're assuming manufacturer's own
24 responsibility. You could use it as a group account
25 and have it sent to a variety of different people each

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1 time. That's your choice on that.

2 But the rut is and let's go back to the
3 validation. When we start having issues or concerns
4 or you have issues trying to get into our system and
5 we're communicating on that, we're only going to
6 communicate with the primary or secondary or at least
7 in the presence of them if you're going to use a third
8 party. In order to do that, we're going to validate
9 that we're talking to the right person. So you have
10 to designate that person that he's going to be the
11 contact.

12 We're going to have a validation procedure
13 which basically we're going to give you a series of
14 questions. This is our current thinking anyway. They
15 will be very straight forward, general topics but
16 distinct. It's sort of like Yahoo account. You'll
17 pick a number of those, two or three. Then those are
18 what we're going to validate against each time.

19 We may ask you once. We may ask you two
20 questions or three. You have to give the answers to
21 those before we're ready to go. It really depends on
22 what's going on and what the nature of the conflict is
23 and how much information we have to give back. So we
24 want to make sure this is secure and we're talking to
25 the right people.

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1 CHAIRMAN WEINSTEIN: I think to answer the
2 question. We assume that it's going to be a person
3 who can deal with IT aspects. Because for most of
4 those contacts at that point, it will be something was
5 missing or your information didn't come through and
6 let's try to work out why. That's really what we're
7 talking about in terms of contacts. If we're looking
8 for questions about the safety of a product, we know
9 how to reach the people that we have to reach if we
10 need to do that.

11 MR. WHITE: Like in the contact
12 information, if you have general stuff down here,
13 those are the contacts for that. Interpretations or
14 legal issues go to Chief Counsel. That's their phone.
15 We don't have the e-mail account for that but Taylor
16 Vinson was listed on the regulations.

17 The e-mail, these are them for the general
18 issues on ODI or you're submitting documents under
19 that. It's ODI.EWR. External communications is TSB.
20 Foreign recalls is frecalls. Then if you have issues
21 with submissions over SFTP or concerns about that,
22 submitting it to Artemis, it's the Artemis Helpdesk.
23 They're the ones who handle that.

24 Once we get these forms back, we'll make
25 our assignments to you. We should start getting these

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1 forms out and back in July. We will start issuing the
2 user IDs and you'll get your EWR ID, your EWR user
3 account number and name and a password. You'll use
4 the EWR ID in all your file names and in all your
5 contacts with us will be by that.

6 Your EWR user account number, that's how
7 you're going to contact the SFTP and then a password.

8 The one we're going to give you initially is strictly
9 temporary. You'll go to our public website. There is
10 a secure sockets layer ("SSL"). You'll go into that
11 with the password and enter a new password. It will
12 correct it for you and that will take of the
13 transition. Now you can get into the SFTP. Or if you
14 are going to do the death reporting on-line, you can
15 use that password. It will now work for that.

16 CHAIRMAN WEINSTEIN: Do you get a new
17 password every quarter?

18 MR. WHITE: You get a new one every 90
19 days. The old password will be closed and you have to
20 start again. When we issue these user IDs, we'll go
21 through and we'll have that procedure out for you.
22 We'll also give you what's known as our compendium.
23 It's a walk through quite a lot of detail of where we
24 are in the regulations, each one of them, and the
25 interpretation letters, the validation that we're

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1 going to do. We want to make sure that the data
2 that's coming in that it's easy and straight forward
3 as much as possible and makes our job easier and your
4 job easier. It has the contact sheets, all the codes
5 and all the templates and walks through examples for
6 each reporting industry segment. We'll be giving that
7 out in August.

8 CHAIRMAN WEINSTEIN: We'll mail that out
9 to the people who identified that they represent some
10 industry or some manufacturers. But also we'll also
11 mail it out to folks who identify themselves in
12 response to the templates that Jon mentioned before.

13 MR. WHITE: And if for any reason you
14 forget your password during a quarter, contact ODI
15 again and we start the process all over again with the
16 temporary once we validate it and talk to the right
17 person.

18 I left out the RCs. After the quarter
19 data has been submitted in which we have your
20 aggregate and your field reports are in, we start
21 reviewing the data. Your submission is passed. The
22 file name validation is passed. The machine
23 validation of all the data that's been submitted,
24 there are no blanks. The numbers are in numeric
25 fields. Alphas are in the alpha fields. We've done

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1 rudimentary comparisons on that.

2 It's passed all that. We'll start looking
3 at the data specifically to see what it says. In that
4 context, we may find concerns or issues concerned
5 about how the particular fields were filled in and
6 whether we're on the same page. Or we may have
7 concerns over the numbers that are there whether they
8 are too small or too large relative to others you may
9 have submitted within the manufacturer.

10 For whatever reason, we'll be going back
11 and they'll be called "Report Clarifications" ("RC")
12 is our working title. These will generally be in
13 writing and they'll be for clarifications in the
14 process that you may have used or to extract from you
15 request for more EWR data. We do not consider these
16 to be investigations and they won't be regarded as
17 such.

18 CHAIRMAN WEINSTEIN: I was trying to
19 mention before they will go the primary contact point.

20 To the extent that they're asking information so that
21 it might look like we're concerned about a possible
22 potential defect investigation. That contact point
23 may well want to be sharing the request with the
24 safety office, the people that monitor safety within
25 each of your companies. But as far as we're

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1 concerned, it's not an investigative request. It is
2 simply trying to get some clarifications and some
3 understanding about something that looks anomalous in
4 the first instance.

5 MR. WHITE: We'll never be opening an
6 investigation for any EWR submissions. It'll always
7 require an RC in advance of that to get clarification
8 and make sure we're on the same page so we understand
9 what you've submitted and we're in agreement.

10 CHAIRMAN WEINSTEIN: That's not true, Jon.
11 We might open without sending an RC.

12 MR. WHITE: Only if we had other
13 additional information separate from EWR.

14 CHAIRMAN WEINSTEIN: Right. I don't want
15 somebody get a phone call that says "How come you
16 opened? We haven't gotten our RC yet."

17 MR. WHITE: We're treating EWR as a
18 additional data source. We still have our existing
19 ones that have been in place for 30 years. We're not
20 throwing those out the window. We're still going with
21 them. They've worked for us in the past. It is
22 conceivable that we're going to do things directly
23 without the EWR input. Okay?

24 CHAIRMAN WEINSTEIN: Petitions for defect
25 investigations as well. All the existing processes

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1 still exist.

2 MR. WHITE: That's true. Having stumbled
3 through that one. Any questions?

4 CHAIRMAN WEINSTEIN: You forgot one other
5 thing. The updating for fatality.

6 MR. WHITE: In the context of updating,
7 you'll submit hopefully on the first day of
8 submissions. You may get a rejection because
9 something was wrong with the file name and it gets
10 rejected. The next submission comes through and now
11 you've passed the file name. When we get the file the
12 first time, the first notice from Artemis will be
13 "Your file name has been accepted and you have passed
14 validation there or it's not." It's as simple as that
15 and if you've been accepted, it will tell you your
16 next validation you'll be hearing from us in
17 approximately two days about the data validation on
18 it.

19 If it passes that, then the next thing
20 you'll probably be hearing if anything would be an RC.

21 If it doesn't pass that, you have to resubmit.
22 You're given two weeks each time to get the data back
23 into us. We have a ticker in there to keep track of
24 it so we don't lose somebody.

25 You can resubmit three times

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1 unsuccessfully. On the fourth submission, it'll be
2 blocked. There will be a notice sent to us. We have
3 to make contact with you to find out what's going on
4 and whether we're on the same page. Is there
5 something simple here or is it new issues that are a
6 concern? Then you're good to go for another three
7 iterations. Then the same process happens. This is
8 just to make sure that things aren't getting out of
9 wham. That we're all on the same page and we're all
10 trying to work through this thing.

11 Then after the reporting period is over
12 and it's past the 30 days or 60 days for the first
13 three reports, the system will be essentially be
14 locked down. The first report it will probably be
15 open for a little while longer. But essentially it
16 will be locked down and you'll not be able to submit
17 anything new or resubmit anything without sending in a
18 coverletter first to ODI to get clarification on that
19 as to what is wrong and what needs to be updated.
20 We'll probably agree with that and a message will be
21 sent back up to Artemis to accept it and the version
22 number needs to be increased and you're good to go
23 again.

24 Before the closing period, you can
25 resubmit again with a new version number for the data

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1 if you find that you've made an error in it or you
2 were incomplete or something else. You can do that up
3 to nine times within the 30 day period or 60 day
4 without any interference from the machine.

5 CHAIRMAN WEINSTEIN: It's not within the
6 60 day period. It's before the lockdown.

7 MR. WHITE: Before the lockdown. That's
8 right.

9 CHAIRMAN WEINSTEIN: Probably within a
10 couple weeks after the report due date, we will not
11 have locked down using that terminology the system.
12 If you see there was a mistake, you can resubmit. But
13 you have to resubmit the whole worksheet. You can't
14 just say line four of the Excel spreadsheet on this
15 particular model number. Cell number seven has to
16 have eight claims rather than six claims. You have to
17 resubmit the entire form.

18 What Jon is saying after lockdown if you
19 see problems you have to get our approval. We don't
20 expect to have many changes. We want you to get it
21 right the first time. There is one provision which I
22 think applies to child seat manufacturers as well as
23 others where on death and injury reporting if no
24 component was identified in the original claim and
25 then subsequently like a month later or for that

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1 matter six months later you then become aware that in
2 fact they were complaining about the handle. In other
3 words, you had written 99 originally because nothing
4 was alleged. Now you know it was the handle. We want
5 you to update that and again you have to contact ODI.

6 I don't know exactly who you contact but contact ODI
7 to get authority because otherwise you won't be able
8 to resubmit to the system. We want the whole death
9 and injury worksheet submitted together. Again don't
10 just write in that add a number 52 on line four. Is
11 that right?

12 MR. WHITE: Yes, it sounds just like that.

13 The single code of 99 needs to be mandatory that it's
14 updated.

15 CHAIRMAN WEINSTEIN: For vehicle
16 manufacturers, it may be something that may be to bin
17 later but that doesn't apply to child seat or
18 equipment I don't believe.

19 AUDIENCE MEMBER: For the supplemental
20 submission, could we e-mailed that to you or would you
21 require complete resubmission once we get the
22 supplemental information regarding deaths?

23 MR. WHITE: If it's within the reporting
24 period?

25 AUDIENCE MEMBER: After the reporting

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1 period if you get supplemental information regarding
2 deaths.

3 MR. WHITE: You'd send in a coverletter to
4 us which can be by e-mail or hard copy explaining what
5 it is and why you need to do the update. In other
6 words, you found additional information about the
7 death or you found that you left out warranty or
8 something like that.

9 AUDIENCE MEMBER: Referencing this all on
10 the previous submission?

11 MR. WHITE: Yes.

12 AUDIENCE MEMBER: Which e-mail address
13 should we send it to?

14 MR. WHITE: It would be the
15 ODI.EWR@nhtsa.dot.gov.

16 AUDIENCE MEMBER: Now is the coverletter
17 all you have to do or does NHTSA then look at the
18 coverletter and say "Yes, resubmit the report"?

19 MR. WHITE: Yes, you send a coverletter to
20 us and we'll send back a response to you and the
21 system will be unlocked for Artemis.

22 AUDIENCE MEMBER: So then afer that you
23 require that we resubmit that in this order.

24 CHAIRMAN WEINSTEIN: Death and injury
25 worksheet, not all the warranty data. Just the death

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1 and injury worksheet which hopefully won't have too
2 many things on it anyway. With any luck, it will only
3 have that one.

4 MR. WHITE: If for whatever reason you
5 find out that you don't need to go back two quarters
6 to correct an aggregate, you can do that but we would
7 be less receptive to that. There would have to be
8 some explanation for that. But certainly those things
9 are going to happen.

10 AUDIENCE MEMBER: Do we change the file
11 name then to the next subsequent version to the
12 update?

13 MR. WHITE: Yes, same quarter because
14 you're going to update that so the quarter number and
15 year would be the same as the one you're changing.

16 AUDIENCE MEMBER: And that's true ?-

17 MR. WHITE: Yes, you're going to change
18 version number each time you submit it and accept it
19 otherwise once you're accepted it, that's the first
20 version and then everything else gets a new one.

21 CHAIRMAN WEINSTEIN: Those characters are
22 11-13, I think. Am I right?

23 MR. WHITE: Yes, that's right.

24 AUDIENCE MEMBER: So now that we have two
25 or three separate files for submission for one Excel

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1 template would the sequence numbers for these three
2 files be out of order?

3 MR. WHITE: No, there are version numbers
4 for each one of them.

5 AUDIENCE MEMBER: So they are all
6 independent version numbers.

7 MR. WHITE: Yes.

8 MR. SELANDER: Steve Selander from Warner
9 Norcross & Judd. I'm now seeing from this session
10 that you're saying that we're going to have multiple
11 reports that are due quarterly as opposed to one
12 report with all the different categories.

13 MR. WHITE: You're referring to the tire
14 meeting where they don't have to report the field
15 reports.

16 MR. SELANDER: Well, I mean in general we
17 do have to now have multiple reports so you have a
18 report on deaths and another report on aggregate data
19 or do you have separate aggregate data and again it's
20 somewhat different for which manufacturer?

21 MR. WHITE: No, there are two workbooks,
22 the death/injury and the production/aggregate. Those
23 are two different workbooks. They used to be one in
24 Version 1.01. On the templates, they were all put
25 together. We realized we're making mandatory updates

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1 on death and injury. When you update this one, you
2 have to redo the entire submission. The chances of
3 messing up the rest of the aggregate is minimized.
4 Yes, sir.

5 CHAIRMAN WEINSTEIN: Is that clear, Steve?

6 MR. SELANDER: There's only two workbooks
7 then.

8 CHAIRMAN WEINSTEIN: Two workbooks on the
9 60th day and then the field reports are on the 90th day
10 or the third workbook.

11 MR. SELANDER: Right.

12 MR. SHERMAN: Bill Sherman, Porsche North
13 America. I'm a little confused and concerned by this
14 decision to do this and I'll tell you why. In
15 quarter 1 of this year, a consumer's report says that
16 our product causes a child to be injured. It doesn't
17 discuss why so we say 99. Consequently in their
18 discussion with their attorney or physician at quarter
19 3, they come back and say that they determined that it
20 was in fact something on the child seat that caused
21 the injury.

22 Why is necessary to go back and restate
23 quarter 1 because that gives the impression that we
24 were aware in quarter 1 of what caused the injury?
25 Where in reality, we weren't notified of that until

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1 Quarter 3. You make it more difficult for us as a
2 processing point. Isn't it better to say that in
3 quarter 3 we'll just submit a new additional tally for
4 that same event and say now it's an injury of
5 Component 25 and therefore we have done due diligence
6 on reporting for the appropriate quarter. We won't be
7 messing around with any data and just restating and
8 resubmitting. Does that make sense?

9 CHAIRMAN WEINSTEIN: The question has to
10 do with whether or not there should be a resubmission
11 when the component at issues has become identified in
12 a subsequent quarter. I suppose it could have been
13 done that way but most of the people who were
14 commenting in some informal comments said "Oh, no.
15 That way it will look like there's two separate
16 incidents. You'll have double counting." We could
17 have done it other ways.

18 MR. SHERMAN: From an IT perspective and
19 process perspective, a valid reason somebody could
20 consider why we were doing is it wouldn't be the
21 double counting because it would be for the same data
22 in a couple of the fields. So you have that ability
23 to look at the same incident for the two vehicles and
24 determine this isn't two incidents. It's the exact
25 same data.

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1 CHAIRMAN WEINSTEIN: I understand that we
2 could have done it in different ways but we chose to
3 do it this way. We won't be confused and there won't
4 be any stigma or it won't look like two separate
5 incidents because it will say Version 2 on that.
6 Anyone looking will know that it's a replacement for
7 Version 1. Version isn't the right word.

8 As I said, we gave it some thought and we
9 had comments on this as part of our process. I think
10 it came up in several petitions for reconsideration.
11 I know it came up at some of the earlier meetings we
12 had with various members of the industry, not just the
13 child restraining industry. We just felt that this
14 was the best way to do it.

15 A simpler way to do it from an IT
16 perspective is just write us a letter that says
17 "Change it" but we decided we did not want to do it
18 that way. We want to have it come in from the
19 manufacturer, that way the manufacturer vouches for
20 it. We want to minimize the number of times that
21 NHTSA folks were going in to the database and changing
22 things by hand. The more times you do that, the more
23 opportunity there is to make a mistake.

24 MR. WHITE: Also this is early warning.
25 We don't expect the manufacturer to do a lot of study

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1 on things that the consumer alleges some particular
2 component there. The consumer might not even be
3 close. That's what get reported to us and the issue
4 is closed. It may not be right. It may not be
5 anywhere in it.

6 Again we're not going to move on that
7 particular death or injury until we go back to the
8 manufacturer and get clarity on it. We have a process
9 in place for every single fatality. Once we get
10 notified of a fatality, we're going to get back to
11 each of you to go through exactly what happened and to
12 get to end-of-the-line information on it. That's one
13 of our directives. We are very concerned about
14 fatalities. Yes, sir.

15 MR. PAWLICA: Greg Pawlica of Ford Motor
16 Company. Because of the changes in Notice 5, when
17 will the new templates be available?

18 MR. WHITE: The new templates will be
19 available by the end of the month. Ideally it will be
20 next week but I see we have some changes to make so by
21 the end of the month. You should look to see for
22 either a Version 1.2 or higher. Yes, ma'am.

23 MS. GRANT: Marianne Grant from Syncata.
24 I just want to clarify some things you said. First of
25 all on the file name, you said you have .xml and .xls.

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1 Now you have .gif.

2 MR. WHITE: Yes.

3 MS. GRANT: The second thing you said is
4 .jpeg is acceptable but it's not listed here on the
5 paper but that is acceptable as well as Word, .tif and
6 the rest of them.

7 MR. WHITE: Yes, the problem with the
8 .jpeg is that we don't like .jpeg but we realized all
9 of the industry does like .jpeg. That's the way it's
10 going to be so we'll accept .jpeg.

11 CHAIRMAN WEINSTEIN: That's subtle. By
12 not putting it on the list, it doesn't show up so you
13 hoped nobody would notice.

14 MS. GRANT: Next thing on the field
15 report, the final naming convention, that second
16 sheet, the first character for the application is T
17 for transcript. When is a copy of the third report
18 not a transcript?

19 MR. WHITE: Excellent question. It's
20 conceivable because we've limited to only those five
21 formats that a manufacturer's field report that's
22 within the context of what we've called a field report
23 that he has something else. It could be electronic
24 machine data, something else, and can't submit it. It
25 doesn't fit that format. So rather than not

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1 submitting at all, we have a transcript. Again it
2 will be available on the web and it will be in the
3 compendium.

4 Basically it requires a transcript from
5 the manufacturer what that field report actually dealt
6 with. It goes through much the same information, the
7 make, model, model years that are affected. What was
8 the nature of the field report? Were the results
9 found? Who did it? It's quite a template. It's
10 fairly detailed.

11 MS. GRANT: And the last thing is
12 attachments. In the past, you said you didn't want
13 them with field reports but now it looks like you do.

14 MR. WHITE: It's conceivable that a
15 manufacturer will be sending in photographs or
16 something else that has to be in there and it's just a
17 code to designate that there are attachments with the
18 field report.

19 MS. GRANT: So you actually want them now?

20 MR. WHITE: Yes, if it's submittable.

21 MR. SHERMAN: It's assumed now that we are
22 including attachments in the quarterly report, instead
23 of just representing them by an attachment name. Is
24 that what you're saying? You actually physically want
25 the attachments included in, not just the names

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1 attached in the field reports. That's changed from
2 last meeting that I attended.

3 MR. DiMARSICO: Sir, could you speak up a
4 little bit?

5 MR. SHERMAN: I'll restate the entire
6 point. It was my understanding from the past meetings
7 that when there was an attachment file that the file
8 in the field report would be referenced by the
9 attachment file's name like photo.gif. Therefore what
10 I'm hearing now is that you're saying that you want
11 the physical file included. I'm concerned again
12 because we've already been programming all this.
13 We're already doing alpha testing in our database.
14 Now I have to go back to my people tomorrow and say we
15 have programming changes required. Am I understanding
16 the situation that you presented here?

17 CHAIRMAN WEINSTEIN: Jon, what is it? We
18 want the attachments but it should be indicated that
19 it is an attachment. Is that right?

20 MR. WHITE: Yes, that's the coding.

21 MS. GRANT: That is different than you
22 earlier provided us.

23 MR. SHERMAN: This is what we call scope
24 change and where is the notification?

25 MR. PAWLICA: This is six months of

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1 programming, of changing and getting data from our
2 sources. It's not just an overnight change. Actually
3 we were under the impression that all we had to do was
4 indicate on the field report that an attachment
5 existed by a yes or a no. We were even aware of the
6 field name.

7 MR. SHERMAN: In the last meeting I
8 attended here in this building about four months ago,
9 Walter, it was clear that the file name only and then
10 if it was requested during an inquisition we would
11 then provide you on a file by file basis the physical
12 attachment files. These are all different file
13 formats. These aren't easily reported and put in our
14 database. Anyone in IT should know that with all due
15 respects.

16 MR. WHITE: I don't disagree. I think the
17 short answer on this is the provision is there for
18 those who are going to provide us with it anyway with
19 the field reports. They are going to provide their
20 attached film on it whether we've made provisions for
21 it or not. It's there. As far as whether it should
22 be there with everyone of them, our intent was to go
23 that way and to put another transcript that is to
24 identify the attachments that may be undeliverable.
25 Again that machine language that comes in is not

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1 deliverable.

2 CHAIRMAN WEINSTEIN: We may need to look
3 at this again but in any event I think as a minimum if
4 we had said all we want is a yes, no as far as
5 attachments, I have to believe we're going to want at
6 least a feel for the number of attachments. Hopefully
7 that wouldn't mess you guys up too much but we'll have
8 to talk about this and then see what we said in the
9 past. I didn't realize personally that this was a
10 change. Maybe we hadn't focused on it and you guys
11 have to focus on it. We'll have to look at it.

12 MR. SHERMAN: It's not a small change.
13 I'm not even sure how we're easily going to do that
14 because we'll have to store it in our warehouse and
15 then extract them. Then you guys are going to have to
16 decide what format they'll be in. Will it be in the
17 original format or something else? I'm not sure.
18 You'll have to think that through because that may be
19 something that we have to deploy at a later date in
20 fairness to us.

21 MR. PAWLICA: We have 54 sources who are
22 considering coming in that we're reporting from. So
23 you're asking us to go back to 54 different sources to
24 collect data differently now.

25 CHAIRMAN WEINSTEIN: Let's put it this

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1 way. We will look at that issue as to whether we need
2 the attachments at this point or whether we just want
3 indication of whether there are attachments or my
4 middle ground which is an indication of how many
5 attachments there are as of the time of reporting. As
6 I understand depending on how a company does its job,
7 they may actually add more attachments to the original
8 report rather than submitting other reports. Actually
9 I had an inquiry about that from Ford the other day.

10 MR. WHITE: We still want to make a
11 provision that if a manufacturer wants to provide the
12 attachments, that it's available.

13 MR. SHERMAN: Can I say one more thing
14 about that?

15 MR. WHITE: Yes.

16 MR. SHERMAN: I don't want to be
17 argumentative. I'm just doing my job here. Please
18 also consider what implication if any does that have
19 to historical data because on field reports ?-

20 MR. WHITE: The attachments don't affect
21 the field reports.

22 MR. SHERMAN: Why doesn't it?

23 CHAIRMAN WEINSTEIN: You don't submit the
24 copies of the historical field reports.

25 MR. SHERMAN: The reports still exist

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1 though. If you pull data a year from now and say "By
2 the way I see you have an attachment there." It seems
3 to me that you want to see physical files and even
4 historical data. Once you make the decision that it's
5 on-going, you're probably going to want to consider
6 the implication on historical data. Fair enough?

7 CHAIRMAN WEINSTEIN: Probably.

8 MR. WHITE: Certainly. If we're doing RC
9 and we're going back for clarification on a particular
10 field report because it said attachments were
11 unsubmittable or whatever, we may want to see what the
12 content of that is.

13 MR. SHERMAN: We are doing due diligence
14 to the letter. So if I'm being challenging, forgive
15 me but that's my job.

16 CHAIRMAN WEINSTEIN: The other point I
17 just wanted to finish what I was saying before. For
18 those companies that choose by their own ways of just
19 saying "Well the first time we sent somebody out to
20 look at a particular vehicle" that's the field report.

21 Then they send somebody out the next month or two
22 weeks later and then submit another report. If a
23 company chooses to make those attachments to the first
24 field report just because that's the way that they
25 could do it, that's not sufficient. If the next

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1 document that comes in two weeks or two months later
2 meets our definition of field report, then that is a
3 separate field report and has to come in. You can't
4 simply call it an attachment if it meets the
5 definition of field report.

6 If we are talking about the picture that
7 was taken during the first trip, that's something
8 different. I can understand that being an attachment.

9 But if it's a second report or separate report, it's
10 a separate field report and a company can hide behind
11 their preexisting nomenclature both for counts and for
12 submissions.

13 MR. WHITE: We'll need an interpretation
14 on attachments.

15 CHAIRMAN WEINSTEIN: We'll have to talk
16 about that.

17 MS. GRANT: Back on the T thing, so if I'm
18 sending a transcript for some code, isn't it going to
19 apply to a single model, a single platform? Shouldn't
20 there be two fields there, one would say a model
21 platform component and one would say it's a transcript
22 and then the rest of that?

23 MR. WHITE: Well, it's an either or. It
24 either applies to a single model or it applies to a
25 platform or it's going to apply to more than one

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1 model.

2 MS. GRANT: Right and it's a transcript.

3 CHAIRMAN WEINSTEIN: T just means "other".

4 Or am I wrong, Jon? I don't know why it says
5 "Transcript." I don't know what that means.

6 MR. WHITE: It stands for "one that is not
7 deliverable."

8 CHAIRMAN WEINSTEIN: It has nothing to do
9 with deliverable. It has to do with whether it
10 applies to a vehicle, a platform or multiple models or
11 platforms. Whether it's deliverable or not, you're
12 supposed to have to put that in. We may need to talk
13 about this one too. As we said, this is our first
14 version externally. Internally we have a lot of
15 versions. This is our first public airing of this and
16 it may need to be changed before it's finalized. I
17 guess I don't spend a lot of programming time on this
18 format until we finalize it. Let's just talk about
19 that.

20 MR. WHITE: It doesn't matter.

21 CHAIRMAN WEINSTEIN: We'll talk about that
22 later.

23 MR. WHITE: Yes.

24 AUDIENCE MEMBER: I don't think this is
25 interpretative but for a child restraint manufacturer

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1 typically for our field reports we inspect the entire
2 product. The subject component codes, how do we code
3 it? Is it basically the code that the complaint
4 originally came in on? If we find a defect in a
5 different component, do we do that? It's much
6 different than a vehicle because the entire system is
7 looked at in total for a field report.

8 CHAIRMAN WEINSTEIN: You need to at least
9 mention within the component that was identified by
10 the consumer.

11 AUDIENCE MEMBER: The reason why it came
12 in.

13 CHAIRMAN WEINSTEIN: The reason why it
14 came in and anything else that you're inspector,
15 engineer or whatever sees and refers to as being
16 problematic or broken or whatever word you want to
17 use. If they say, we also looked at the handle and it
18 was fine, that doesn't have to be there because the
19 definition of field report implies that there's
20 something wrong.

21 Having said that, I think we come to this
22 Notice 5. If the inspector goes out let's say on a
23 handle complaint and says "The handle is fine" but
24 there is a problem with the base, you still have to
25 put in handle because that's why you were there in the

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1 first place and it was being analyzed. But if just
2 coincidentally they're also were looking at the side,
3 you don't have to put seat shell down as a component
4 that's covered by that field report. Is that
5 consistent with what we've said before?

6 MR. WHITE: Yes.

7 CHAIRMAN WEINSTEIN: Thank you. My
8 conscience.

9 MR. WHITE: Any other questions?

10 MR. IRISH: Jeff Irish, TRW Motors.
11 Basically I'd like to look at what's actually being
12 expected for the "other" engineering or "other"
13 equipment for the manufacturing report. It appears
14 that as far as quarterly reporting the only thing we
15 have to report to is to the fatality claim.

16 CHAIRMAN WEINSTEIN: That's right. Claims
17 and notices.

18 MR. IRISH: In relationship to that as far
19 as us submitting to get an identification number, I
20 believe it's stated in one of the sections in 579 that
21 it is just expected to be done 30 days before the
22 report is submitted. Is that what we should do?

23 CHAIRMAN WEINSTEIN: Yes, that's for
24 everybody.

25 MR. IRISH: Are you expecting us to do

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1 that in July along with everybody else or can we wait
2 until we actually have a quarterly report?

3 CHAIRMAN WEINSTEIN: That's right.

4 MR. WHITE: If you're an equipment
5 manufacturer, a low volume vehicle, and you have only
6 to report death, don't file for a user ID unless you
7 have a death incident to report. What will happen
8 when it comes in to us is as one of the criteria we'll
9 ask you what the product is and if it's equipment,
10 we'll go back to find out if you've actually had a
11 death because we don't want to be deluged with the
12 blanks.

13 CHAIRMAN WEINSTEIN: The thirty days still
14 applies because the death would have occurred during
15 the quarter. The report isn't due until 30 or 60 days
16 later. You should know at that point and make the
17 request for a name and password at that point.

18 MR. IRISH: At the point that we do the
19 request, we will be given a hint.

20 MR. WHITE: Yes, for most. Erica.

21 MS. JONES: This might be an
22 interpretative question. We've noticed in getting
23 ready to make the first report that the consumer calls
24 to take advantage of the recall particularly in child
25 restraints where there's an 800 number to call to get

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1 them to participate in the recall. It appears to be
2 covered by your definition of "consumer complaint"
3 because it's literally a communication about the
4 defect. There's no carve out for recalls the way
5 there is in warranty claims. How do you want
6 manufacturers to deal with that?

7 MR. WHITE: The short answer is they just
8 provide the information. We're going to be screening
9 through when we try to unwind this information what
10 our recalls are that we know about through internal
11 investigations and the like. That will be taken into
12 consideration when we're looking at the data.

13 There are some manufacturers that have
14 separate reporting systems and warranty to track the
15 recall repairs and such. That's not what your
16 question was. It's consumer issues. That would be
17 reported. We'll have to take that into consideration
18 when evaluating the data.

19 MS. JONES: Well, just to clarify that, a
20 separate dedicated 800 number would still be a unit
21 within the company receiving consumer complaints. So
22 if it's a communication inbound and it's about the
23 recall, that gets counted whether it comes in to the
24 master 800 or dedicated number.

25 CHAIRMAN WEINSTEIN: No, it wouldn't.

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1 It's not a complaint. If someone is calling to say "I
2 understand you're conducting a recall and I would like
3 to get a new seat".

4 MS. JONES: It's a communication about a
5 defect.

6 CHAIRMAN WEINSTEIN: But it's not a
7 complaint.

8 MS. JONES: That's not what the definition
9 says.

10 CHAIRMAN WEINSTEIN: Put it in writing and
11 we'll look at it.

12 MR. WHITE: One thing on the equipment,
13 death and injury, you're not to use codes with that.
14 It's right out of the text exactly what the equipment
15 was that was the problem.

16 CHAIRMAN WEINSTEIN: Describe what the
17 allegation is in. How many characters will they have?

18 MR. WHITE: I think we gave them a
19 gazillion, didn't we? Sixty I think was our minimum.
20 Forty, so basically title. Yes, sir.

21 AUDIENCE MEMBER: For the other equipment
22 manufacturers, the reporting obligations on early
23 warning require you to report that quarter and for the
24 full prior calendar year. If we do not have a death
25 to report in this full reporting here, do we also have

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1 to look back four calendar years and fill a report for
2 that?

3 MR. WHITE: No, for equipment, you're only
4 reporting for whatever came in on the quarter. On
5 production, it's five years old, the four preceding
6 years plus the current year. It's a death incident
7 that affects that production but it has to be during
8 the quarter.

9 AUDIENCE MEMBER: The four-year aspect is
10 related to the model of production, right? So if you
11 get a death or injury for a model that was produced in
12 2000, you would report that. But if it's for a model
13 that was produced in 1995, you would not report that.
14 Is that correct?

15 MR. WHITE: That's right.

16 CHAIRMAN WEINSTEIN: For a child
17 restraint, that's right.

18 MR. WHITE: Or equipment.

19 CHAIRMAN WEINSTEIN: For a vehicle 1995,
20 you would still have to report it because we go back
21 the current year plus nine.

22 AUDIENCE MEMBER: That's a '99 model.

23 MR. WHITE: Again that's part of the
24 validation we would reject if you're trying a report
25 on an older product than what we're asking for.

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1 CHAIRMAN WEINSTEIN: Because one your
2 production submission, it wouldn't be there. So there
3 would be a disconnect.

4 AUDIENCE MEMBER: The historical reporting
5 now that everything has slid a quarter it looks on the
6 packet that it seems to be inconsistent. Should the
7 historical reporting end the end of the second quarter
8 this year or the end of the first quarter?

9 MR. WHITE: Second quarter.

10 CHAIRMAN WEINSTEIN: Yes, everything's
11 been moved over from July. Start with July 2000,
12 third quarter 2000 through the second quarter 2003.

13 MR. WHITE: So the current quarter is
14 relegated to historic. Any other questions?

15 CHAIRMAN WEINSTEIN: Thank you for coming.

16 MR. SELANDER: Steve Selander again.
17 Warner Norcross & Judd. The Rule itself talks about
18 getting the manufacturer ID and that's now what you're
19 calling the user ID. Are we going to change the Rule?
20 Are we going to change using the manufacturer ID now
21 as an identifier of a particular report? Or are we
22 going to keep it with two manufacturer IDs?

23 MR. WHITE: Yes, I suppose we ought to be
24 on the same page with that. They've been different
25 entities and we've referred to them as different

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1 titles. They are all the same. We have to go with
2 the Reg. We'll use that but there is a difference
3 between the manufacturer ID and the EWR user account.

4 MR. KOESSLER: A fairly generic question.

5 CHAIRMAN WEINSTEIN: Can you identify
6 yourself?

7 MR. KOESSLER: I'm Jim Koessler with
8 Robert Bosch Corporation. When you are a U.S. company
9 that has a European parent, where Bosch will be
10 claimed, Bosch U.S. will be claimant doing any
11 reporting and you have a European parent, is there a
12 single filing that should be made to say that Bosch
13 terminated the points, Bosch, U.S. is its agent for
14 filing or should that only be done when there's an
15 actual filing due? Should Bosch put a single notice
16 on file that Bosch was the company for an filing
17 purposes or should that just be mentioned within the
18 people who are reporting this file?

19 CHAIRMAN WEINSTEIN: For an equipment
20 company as we said before unless you have something,
21 don't tell us anything. When you request your user ID
22 or manufacturer ID - that prior question confused me -
23 identify who you are reporting for. That applies to a
24 lot of other things. We talked about it before about
25 subsidiaries and parents. We want everyone not just

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1 domestic/foreign. We want that to stay consistent.
2 In other words, we don't want one reporting period to
3 have one name and the another reporting period to have
4 another name unless there's been a change in the
5 corporate structure. Keep it consistent in terms of
6 who is doing reporting rather than one time having it
7 done by three entities and one time having it done by
8 one entity.

9 MR. WHITE: There's only going to be one
10 user account to a manufacturer. Once you've made that
11 report, identify on there for equipment particularly
12 who the companies you might be representing underneath
13 that.

14 CHAIRMAN WEINSTEIN: Somebody big like TWR
15 probably has a lot of people making a lot of different
16 things for them with different names. It's in a sense
17 up to them whether it all comes in under TWR or not.
18 You said for example in vehicles Ford can or does not
19 have to report for Volvo and Jaguar but we don't
20 necessarily expect it to. Is that right, Jon?

21 MR. WHITE: It's not going to be the one
22 user name per company. It's only going to be one
23 account and one password for manufacturer ID. Yes,
24 sir.

25 MR. ST. YOUNG: Shane St. Young, Stanley

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1 Electric Equipment which he just referred to. For a
2 parent company that is in Japan that exports to the
3 U.S., if we need to go through these steps because of
4 recall or campaign or something, we get an ID for our
5 parent company if we would be reporting for them. Or
6 can we have multiple companies? There is our company
7 which is Stanley Electric U.S. and then there's also
8 Stanley Electric Limited Japan.

9 MR. WHITE: Two things on it. One is if
10 you're just reporting service, communications or
11 recalls, you don't need a user ID. The only time you
12 need a user ID is if you're doing a death.

13 MR. ST. YOUNG: Death or injury.

14 MR. WHITE: With respect to that, not
15 limiting the accounts to manufacturing if you wish to
16 do that, you can at this point.

17 CHAIRMAN WEINSTEIN: We normally expect
18 the importers would be statutory manufactured under
19 our statute to be doing the submissions of all foreign
20 activities.

21 MR. WHITE: So designate an agent or
22 representative, right?

23 CHAIRMAN WEINSTEIN: Not necessarily.
24 Designated agent means something else. But the
25 importer is the manufacturer of the product as far as

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1 we're concerned and they at least have the
2 responsibility. We expect them to be in appropriate
3 contact with the foreign parent and/or subsidiaries
4 and/or sister or brother corporations to make sure
5 that the information about foreign recalls and other
6 foreign information is submitted to us in a timely
7 fashion.

8 If we find that it isn't happening, we've
9 said this in the foreign recall notice that we can
10 take action at least against the importer to make sure
11 that things happen the way they are supposed to
12 happen. We're not trying to trap people. We just
13 want all the multi-national corporations to organize
14 themselves in a way to make sure their
15 responsibilities are known and funnel the information
16 to us in a timely fashion. Thank you all for coming
17 and we'll see some of you tomorrow at the vehicle
18 meetings.

19 (Whereupon, the above-entitled matter was
20 concluded at 2:22 p.m.)
21
22
23
24

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OFFICE OF DEFECTS INVESTIGATION

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EARLY WARNING REPORTING PUBLIC MEETING

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THURSDAY,
JUNE 19, 2003

The meeting was held at 9:30 a.m. (Session I)/
1:00 p.m.(Session II) in the Oklahoma City Memorial
Room of the Department of Transportation's Nassif
Building, 400 Seventh Street, SW, Washington, D.C.,
Ken Weinstein, Associate Administrator for
Enforcement, presiding.

PRESENT:

KEN WEINSTEIN	Associate Administrator for Enforcement
ANDREW DiMARSICO	Office of Chief Counsel
ROBERT SQUIRE	Defects Assessment Division
TAYLOR VINSON	Office of Chief Counsel
JONATHAN WHITE	Defects Assessment Division

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P-R-O-C-E-E-D-I-N-G-S

9:46 a.m.

CHAIRMAN WEINSTEIN: On the record. Let's get started, folks. Good morning. My name is Ken Weinstein. I'm the Associate Administrator for Enforcement with NHTSA. With me up front today are Jon White who will be giving a presentation. He is the head of the Defects Assessment Division within the Office of Defects Investigation. That group is going to be for the most part initially handling the reviewing of the early warning data that will be coming in. Also up here are Taylor Vinson and Andrew DiMarsico of our Counsel's Office and Bob Squire who works with Jon.

As you all know the TREAD Act authorized and directed NHTSA to issue the Early Warning Regulations with the goal of getting information that will enable us to promptly identify possible defects for us to commence investigations in a prompt fashion.

We met the very difficult timeframes specified in that statute and got our final Rule out last July. We subsequently have issued two notices in response to petitions for reconsideration of various provisions of that Rule, one in April which we've euphemistically called "Notice 4" because that's the way the Federal

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1 Register calls it. That was in April.

2 Just last week we put out Notice 5 which
3 dealt with other issues. We then also in part
4 primarily because of delays in getting those Notices
5 out and answering the number of questions from the
6 industry have postponed the initial reporting period.

7 There are some tweaks to it so we basically pushed
8 everything back three months and some things a little
9 more than three months. There are a couple of
10 remaining issues on reconsideration that we will
11 hopefully deal with in the near future.

12 In addition, we issued many
13 interpretations in response to requests from
14 interested persons that can be found in one place.
15 We've put them all together at one place under
16 Interpretations on the NHTSA website under Early
17 Warning Reporting Interpretations. They can be
18 reviewed there. As new ones are issued, they will be
19 put in that location on the website.

20 Now this meeting today is primarily
21 intended to deal with how-to issues, process issues,
22 how report will be made. To the extent that we get
23 into any interpretative issues, I just want to caution
24 everyone as I did in the meeting that was held several
25 months ago and the meetings yesterday that what we say

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1 here we're trying our best to give our views.
2 However, anything said here doesn't really bind the
3 Agency as consistent with our long-standing practice.

4 If you want an interpretation, you should write in to
5 the Chief Counsel's Office. We'll turn that around as
6 quickly as possible and it will be issued by the Chief
7 Counsel.

8 With that I'll turn it over to Jon who
9 will make a presentation and then following that we'll
10 have questions. We have a microphone out there. If
11 you have questions, please identify yourself, the
12 company or entity you're with and come up to the
13 microphone or maybe somebody will pass it around.
14 Anyway, you have to talk into the microphone. Jon.

15 MR. WHITE: Good morning. I'll go over
16 the agenda briefly. We'll be talking about 579 and
17 the changes that have been made to it. We'll be
18 including external communications, the foreign recall
19 reporting and the substantially similar vehicle
20 listing. Then we'll get through EWR reporting which
21 goes through the production, the warranty, property
22 damage, consumer complaints and field report counts.
23 That's part of a separate workbook.

24 Then we'll go through the death and injury
25 workbook which is also a separate one. It has to be

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submitted after production. Then we'll go through the manner of reporting, manufacturer ID management, schedule of reports and post data review and then compendium.

This is an overview of the responsibilities for each reporting segment. You have that in the handouts.

External communications, it's part of 579 Subpart A. Within that, you have the old 573.8 standard one that's been there for about 30 years. It has addressed service communications that pertained to a defect. In addition to that, we've added to that campaigns, procedure related campaigns, consumer satisfaction and that one becomes due on July 1st. That date's been changed from the earlier one of April 1st.

Foreign recalls, if you are an importer in this country and you are conducting a safety campaign in a foreign market and you have a substantially similar vehicle, you're obligated to report that to us within five days of the manufacturer's determination or the government's order. The information contained to the report is largely what's in the 573, identification of the manufacturer, identification of the vehicle, identification of the defect. You also

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1 have to tell us what the substantially similar vehicle
2 is and what the markets are that are affected. That's
3 due like I said every five days.

4 Under Early Warning, you have production
5 that's going to be on the nine previous model years.
6 Then you have property damage, consumer complaints,
7 warranty and field reports. That's one aggregate.
8 That's one sheet. That comes in. We want that coming
9 in first. Everything that you put in production which
10 we'll get to later in the templates we're validating
11 against that.

12 CHAIRMAN WEINSTEIN: Jon, sorry.
13 Production comes in first, right?

14 MR. WHITE: Yes, well it comes as one
15 spreadsheet. All those are together in one template,
16 that series. The other one is the death and injury
17 report which reports fatality claims and notices and
18 injuries and claims, foreign and U.S.

19 Starting off with the templates that
20 you'll see, we should be updating those probably next
21 week. You should see that it's a 1.2 or higher. Some
22 of them may be a 1.3 but if you're not using 1.2, you
23 have the wrong version. It has to be 1.2 or higher.
24 This information has to be filled out each time. It's
25 pretty much the standard information. You are putting

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1 in a report quarter report year. Same for heavy
2 trucks.

3 This is the light vehicle aggregate. This
4 is the master production template. It is the one that
5 we're going to be comparing everything to. When you
6 put something in this production and you're telling us
7 that it's a 1999 Bullrider, that's fine. We'll accept
8 that. We expect it filled out with the types and
9 platforms where applicable.

10 But then when you're submitting the other
11 templates such as warranty, property damage, field
12 reports, consumer complaint counts and death and
13 injury, they have to be the same. It has to be that
14 1999 Bullrider. It can't be a 1999 Bullrider
15 Smoothrider. That's not going to work. It will
16 reject the report.

17 Why don't we go back? It's all right.
18 You have it on this one. With the light vehicles, in
19 addition to the make, model, model year, you have
20 type. We have only four types in there. They are in
21 the template. We've handed them out in the handouts.

22 It's basically incomplete chassis, light truck,
23 passenger car and multipurpose passenger vehicle.
24 Platform, that's you're defining it. We've pretty
25 much left that wide open.

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1 This is a sample of the aggregate
2 worksheet. It's pretty much the same for all of them.

3 There are for light vehicles something like 18
4 component codes. It's up to 24 for all the other
5 manufacturers such as the heavy vehicle and bus
6 manufacturers. Each one gets filled out.

7 The point on this is if you're in the
8 process of filling this out by make, model, model year
9 and you find that you have nothing to report for
10 consumer complaints for steering, you don't leave that
11 blank. It has to have a zero in there. Every cell
12 has to be filled in.

13 Now if you have nothing to report for the
14 same make, model, model year in that particular
15 consumer complaints for instance and none of those
16 compliments are applicable, you can either put zero
17 all the ways across or you can delete the line. It's
18 only in this warranty, consumer complaints fields. It
19 still has to be there in production. We want to know
20 all the production that applicable.

21 Death and injury templates, because it's a
22 separate one, you have another manufacturer
23 identification. Again make sure it's 1.2 or higher in
24 the template revision number.

25 We've had some questions and some concerns

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1 over the ID. One of the things that will change from
2 this template will be that it will now be called
3 "Sequence ID" or "Seq ID." That's because this idea
4 is basically a sequential number for each incident
5 that you're reporting whether it's a death or injury
6 incident. It is essentially a row ID. For each
7 quarter, it's starting at one and going on as many
8 death and injury incidents that you have to report.
9 You start back over again. It's unique to us because
10 you're reporting it by your manufacturer.

11 But we've given you the second field which
12 is the manufacturer unique ID. That's whatever you
13 want it to be. I think we have 40 characters a line.

14 You code it as you want. That's one of the few
15 fields that can be null.

16 Make, model, model year. That's minimal
17 specificity. It has to be there. If you don't have
18 one of those terms, don't report it. We don't want to
19 know about it. You can tell us about it when you have
20 that information.

21 Now if you're reporting on a foreign death
22 and it comes in, we don't want to know about the
23 foreign vehicle. We want to know what the U.S.
24 substantially equivalent is and report that there.
25 Otherwise it's going to fail validation again because

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1 we're checking against production. It doesn't meet.
2 It will get dropped out. Will it be able to identify
3 it as a foreign because you can either have it in the
4 VIN? You can use the effective vehicle's VIN or of
5 course in the state or foreign country.

6 The number of death incidents and the
7 number of injuries. It's self-explanatory. Incident
8 date is calendar date.

9 CHAIRMAN WEINSTEIN: We want six digits
10 there, right, Jon?

11 MR. WHITE: Yes.

12 CHAIRMAN WEINSTEIN: So if it's March,
13 it's 03. You don't want just three or you don't want
14 write out March, right?

15 MR. WHITE: Yes.

16 CHAIRMAN WEINSTEIN: And then two digits
17 for the year.

18 MR. WHITE: Yes, we'll have instructions
19 as part of the compendium. We'll have detailed
20 instructions going through each one of these fields,
21 what we want there, what our validation is.

22 State or country. It's important to use
23 if it's a U.S. state or territory the Postal Service
24 Codes for two characters abbreviation. Don't write it
25 out or it will be rejected. But if it's a foreign

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country, it has to be written out in text. Don't abbreviate it. It won't be accepted. It has to be three characters or more.

Then the SysComponents. These are the standard ones, 1 through 22 plus 23 and 24 for the fuel fire and rollover and then 98 and 99. The important one here is that we're validating from left to right so SysCompA has to be filled in. We don't care which one you put in there first as long as it's not 98 or 99. If you have another component system, put that one in there first. We don't care which one it is. We're not validating for priority of that.

If it winds up with being a 99, you have to update the spreadsheet. The VIN and a single code of 99 have to be updated because they are mandatory.

CHAIRMAN WEINSTEIN: Can I try something? Just for those who aren't familiar with 98 and 99, 98 means that there's a component that was allegedly responsible for the crash or responsible for the fatality or injury that does not fit within one of the 24 categories that we specified.

A 99 means that the complaint or notice did not specify any category whatsoever. If 99 is there, it has to be by itself obviously and that should be in the first column where it says A. But

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1 theoretically they could specify steering system and
2 also something else that isn't one of the specified
3 components and then you would have steering or
4 suspension or whatever it was and then a 98.

5 So there can be others but I think Jon
6 said you can put them in any order you want. We
7 prefer them to be lower numbers moving up and 98
8 should be the last thing. If you have something else
9 plus 98, 98 should be to the right.

10 MR. WHITE: Okay. As I said, the two
11 fields in here, VIN and sole SysComp of 99, those are
12 the update ones. That's one of the reasons why this
13 spreadsheet has been broken out as a separate report.

14 Whenever you want to change these things after you
15 have a successful submission, we'll go through that
16 later. You have to resubmit the entire workbook. So
17 if there's a change to the production or the aggregate
18 accounts for a quarter, you have to submit the whole
19 thing even though it's just one little cell in there.

20 It's the same for death and injuries. We
21 accept because of the mandatory replacement on VIN in
22 99, there will be a number of death and injury ones.
23 Each new one will be a new submission number. We'll
24 go through that. That'll come up later.

25 Historical one-time report. It's going to

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1 include 12 quarters. We want the production totals,
2 the number of warranties that we received in each
3 calendar reporting quarter. We start from July 1,
4 2000 and went through June 2003. It has to be
5 submitted electronically and you use the standard
6 templates. You just don't fill in the other
7 templates, just production, warranty and field
8 reports. Again it's accounts only. We're not looking
9 for the documents underlying it.

10 This is a graphical representation of what
11 these reporting periods are going to be and what's
12 covered in each quarter in terms of production and the
13 product that's susceptible. What you're going to
14 report on is only what comes in each quarter. It's
15 the vertical line but it's for whatever the row
16 product is. It's probably as clear as mud.

17 Field report submissions. This has been
18 pushed back. We're not going to request those until
19 the first quarter of 2004. The first report is due 30
20 days after the submission of the aggregate which puts
21 it at July 1st. We have a schedule coming up here and
22 it's in the handouts as well. Again because these are
23 the submissions as opposed to the aggregate counts, it
24 doesn't include the dealer reports.

25 When you're submitting a field report

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1 whether it's electronic or in hard copy, you have a
2 choice but there'll be a file naming convention. It
3 has to be a product that you've reported in your
4 production template. It's going to be validated
5 against that. It has to be issued during the
6 reporting quarter and it's affecting one or more of
7 the applicable components for fire or rollover. If it
8 doesn't meet this criteria, it doesn't get submitted.

9 By definition, it has to be an assessment
10 of an alleged failure, malfunction, lack of
11 durability, other performance problems of a
12 manufacturer's product by an employee or
13 representative of the manufacturer. These are after
14 it's left the manufacturer's control.

15 Questions come up about attachments to the
16 field reports. We talked about this at the September
17 24th meeting. We talked about it yesterday. The
18 attachments. When you have a field report and it has
19 attachments on there, we want you to note that the
20 attachment is present. You don't have to submit those
21 attachments unless you choose to. We have that
22 provided in the filing naming convention which you've
23 seen in the handout and we'll get to later on. But
24 that's voluntary as far as submitting it but you have
25 to denote it on the field report.

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CHAIRMAN WEINSTEIN: I would like to make one other clarification to that. I understand some manufacturers have a field report and every other subsequent document that relates to that field report gets attached to that field report. In those kinds of situations if a subsequent document or communication would by its own terms be a separate field report, it must be submitted to us even though the company might call it an attachment. In those cases, we must get it but we are to get it separately not because it's an attachment but because it qualifies as a field report.

MR. WHITE: The same would go if you have a field report in one quarter and you're running a follow-up on the same incident or the same issue, you still have to resubmit that new field report and any subsequent field reports.

When you are submitting, each one has to have a distinct file name. It's used to identify each field report. Again it's for electronic or hard copy submissions. In that context, we need for you to identify the product as well as the component codes. We'll get down to the report file naming convention. It's pretty awesome.

Field report formats. We're accepting .pdf, .tif, .txt, .doc and .rtf. These are the ones

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1 that we prefer but we're accepting .jpeg as well. I
2 understand that most of you have used .jpeg. In
3 certain instances, we'll find that field reports are
4 not in these formats and can't be submitted as such.
5 Those will have a template for transcripts, field
6 report content transcript. It will be available on
7 the web. We'll have it in the compendium.

8 It'll walk through what the product is,
9 what the issue was, the substance of it, results and
10 findings and some other factors in there to be
11 submitted instead of the actual field report. The
12 same thing is in the context of the field report. The
13 majority of it is submittable but it's not in there.
14 It is not an attachment. Then it would be denoted
15 with a transcript but that may not occur.

16 Manner of reporting. The only thing that
17 comes through the SFTP or that you need a user ID
18 account is the quarterly reporting of aggregates or
19 the field report submissions. Everything else comes
20 to ODI. So if you have any external communications
21 and foreign recalls, you send them by mail or e-mail
22 to the Agency. Any explanatory or mandatory cover
23 sheets or ones that you want to send in to explain
24 what your submission is or if there's a particular
25 point that you want to make that we should not be

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1 concerned about, then that should come to ODI rather
2 than over the SFTP. It'll reject.

3 Anything coming, these aggregate reports
4 or these field reports submitted electronically are
5 going to need the manufacturer ID, the user account
6 number, name and a password. We'll be providing
7 those. We'll go through that a little later on. Keep
8 going.

9 This is an example. This is in the
10 handout for you. It's basically going through what
11 these things look like. The first six characters is
12 the manufacturer ID. The next is reporting category.

13 Those are the designated category factors in a two
14 year calendar year. The next one's a single digit
15 quarter. The next is a three digit version number.
16 You'll be starting off with one for everything and as
17 it increases whether if it's your production one and
18 you wanted to change that and come up with a new one,
19 then that's version two. The other submission for
20 death and injury if that wasn't changed that still
21 remains as version one.

22 These are the three acceptable files.
23 Aggregate and death/injury are the aggregate files.
24 Field reports are the image files. The next is
25 sequence numbers. Hopefully nobody will ever need

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1 those having that many sequence for that. In the
2 context of an aggregate, that assumes that you need
3 that many Excel spreadsheets or workbooks.

4 This is for the field report one. When
5 you submit for field reports, you'll have that first
6 one we went through for file naming convention. Then
7 it starts off with this one for each individual dealer
8 report that's going to be submitted.

9 CHAIRMAN WEINSTEIN: Jon, if I could. We
10 said this yesterday but I want to make it clear. We
11 spent a lot of time and a lot of folks within the ODI
12 spent a lot of time trying to come up with a file
13 naming convention that makes sense and doesn't impose
14 burdens but yet allows us to be able to find the
15 things we need to be able to find.

16 We presented it yesterday for the child
17 seat manufacturers and there were some concerns. As
18 we said yesterday, if people have better ideas, please
19 bring them to our attention promptly. We'll try to
20 maintain some flexibility with this at least for a
21 short period of time. We know we have to finalize it
22 eventually so you can start using them. But of course
23 the first copies of the field report don't get
24 submitted for about a year now so there is some time
25 on this. It wouldn't start until the first quarter of

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1 next year.

2 We do remain flexible. Jon is going to
3 explain the way we set it up now. But as I said, if
4 someone has other ideas please let us know as soon as
5 you can.

6 MR. WHITE: If you're going to submit
7 electronically, each one of them gets an individual
8 file name such as this and then you're going to put
9 them in a zip file with that file naming convention
10 and a .zip extension.

11 The first character again is to designate
12 if it's a single model. The field report pertains to
13 only one model. If it pertains to a platform, a group
14 of vehicles, then you designate that. If it's
15 multiple models that aren't part of a platform,
16 transcends the platform, then that's where the M comes
17 from. If it's a transcript regardless of whether it
18 fits more than one model or platform, it gets a T.

19 Next is the taking off either the platform
20 designation or the model that affected and this can be
21 truncated but not abbreviated. These next four
22 characters, these are tokenized to try to keep things
23 to be able to break them down and get some
24 understanding there. But the first two characters are
25 the start year of the field report. 02 or the second

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1 sequence is for the finished year of the product that
2 you're reporting on.

3 CHAIRMAN WEINSTEIN: Model year.

4 MR. WHITE: Model year in this case. Next
5 are the component listings and there could be up to
6 five different components that you would list in this.

7 Any 98 or 99 don't have any relevance for us here so
8 they are not permitted. Even if they're part of it,
9 don't ever report them. If you have a one and a two,
10 that gets reported. No 98 and 99. It will fail
11 validation.

12 The sequence number. It's conceivable
13 that for a given model and product year and component
14 area that you're going to have more than one field
15 report on a given subject. That's where the sequence
16 number comes from. If there's any attachments and you
17 choose to send attachments to a field report, that's
18 where those get identified.

19 CHAIRMAN WEINSTEIN: Jon, I thought you
20 said earlier, it was going to be a yes or no. Do you
21 want the number there?

22 CHAIRMAN WEINSTEIN: No, this would be if
23 you choose to send in attachments, that's how we
24 designate the attachments.

25 CHAIRMAN WEINSTEIN: A number one means

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1 yes and a number zero means no.

2 CHAIRMAN WEINSTEIN: No, it means that
3 it's the first attachment to that particular field
4 report.

5 CHAIRMAN WEINSTEIN: Oh, if it is the
6 attachment, you say which attachment it is.

7 MR. WHITE: You can't see it because .jpeg
8 is down there off the screen but it's another one.
9 The manufacturer ID management, ODI will be doing the
10 assignment. Some of you have already requested the
11 user IDs. Some of you have already participated in
12 the program back in January. We'll be using those.
13 That will be your same manufacturer ID but there will
14 be an additional two zeros in front of it because it's
15 six characters now instead of four.

16 The EWR account name and a temporary
17 password will be all new for everyone. In order to
18 get that, you have to complete what we call the EWR
19 account application form. It's essentially a
20 spreadsheet. We'll put that out on the web and we'll
21 send that out to everyone upon request or the ones who
22 have already submitted requests for us. Basically it
23 walks through a spreadsheet walking through the
24 manufacturer and identifying it, who you're reporting
25 for, who is your parent company and in certain

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1 instances, for each reporting category how long
2 they've been in business if it's less than the 1994.

3 We're also going to identify the primary
4 and secondary contacts. There will be various other
5 information that may not be applicable to everyone.
6 It's a general form that's going to be out there.
7 Primary with this thing is a validation of
8 verification protocols which we want to make sure of.

9 You can tell us that this is your primary contact and
10 here's the e-mail and all that stuff but if somebody
11 else calls up and say they are that person, we have no
12 clue. So we're going to have a validation procedure.

13 That will be encapsulated in that.

14 Our current thinking right now is that
15 we'll give a series of questions. You'll pick out one
16 or more of those and those will be recorded. Each
17 time that person makes contact, they'll have to answer
18 that validation. Anytime you have a third party
19 talking on your behalf or the manufacturer's behalf,
20 that primary or secondary has to be present or you
21 have to get authorization from them.

22 We'll be accepting these applications in
23 July. We'll begin issuing the IDs in August. When we
24 do that, we'll be sending out the manufacturer ID, the
25 user account name and a new temporary password. When

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1 you get that information, you have to go to our public
2 website. There's a manufacturer account here that
3 uses secure socket layer and you change your password.

4 You have to change your password.

5 You have to change the password if you try
6 to get on the SFTP or get into the secure part of the
7 website. It will fail if you don't. You need to
8 change the password. Once you get it, and it will be
9 in the letter that we're going to send you or the
10 compendium, in the instructions we'll go through all
11 of them on how to get on the website, how to get your
12 password in detail. We're also going to encourage you
13 to use an accessibility test. We'll have that set up
14 then too, to make sure that you're communicating
15 properly with Artemis. That's all that is.

16 And if there's a forgotten password, just
17 go through the whole process all over again once we
18 validate the primary and secondary contact.

19 When the files are being submitted, you're
20 going to go the SFTP. You're going to need the
21 password, the user account and the manufacturer ID.
22 You make the submission through Artemis. There are
23 two levels of validation. The first one is the file
24 name. Does it meet file name convention? Did you get
25 all those characters right? And the other one is for

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1 file. It's talking about the machine that Artemis has
2 certified that your fields are constructed properly
3 and in the right format.

4 When Artemis responds, it will give you an
5 e-mail. It will tell you whether you've been accepted
6 or rejected. If you're accepted, it will go on to the
7 second level. Let's start again. If you are
8 rejected by either validation, it will tell you that
9 you've been rejected and it will give, either on the
10 same page or on an attachment to that e-mail listing,
11 each item that was wrong in the submission for that
12 particular validation.

13 If the file name is accepted, it will tell
14 you that you'll get another validation which will be
15 the file validation. That'll be coming in another 24
16 to 48 hours, one to two days. You'll get that back.
17 That doesn't mean that the data is great and we've
18 accepted that. We've not even looked at that. It
19 just means again that the computer has accepted it or
20 that it means our requirements.

21 After notice of rejection whether it's for
22 the file name or the file, you have two weeks to
23 resend it. We will be tracking on that to try to make
24 sure that nobody falls through the cracks on it.

25 CHAIRMAN WEINSTEIN: We may actually

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1 shorten that period. If it's just a question of
2 changing a format, there's no reason why it should
3 take two weeks. We don't want to unduly delay our
4 receipt of valuable data. The two weeks is just
5 something we threw out internally.

6 MR. WHITE: That's imaginable.

7 CHAIRMAN WEINSTEIN: I imagine in some
8 types of problems we'll be telling you we want to hear
9 back from you a lot sooner than two weeks.

10 MR. WHITE: You can resend once you get a
11 rejection three times. On the third time, the system
12 will lock. We'll be communicating with you. We'll be
13 notified that this person has submitted three times
14 and failed. Once we've cleared up what the issues are
15 which I'm sure everybody understands what the problem
16 is, it can be resubmitted. The system will be
17 reopened again and you can recycle for three more
18 attempts if necessary.

19 Again if there's an acceptance, there
20 won't be an issue with that. Once you get initial
21 acceptance, the version number is one for all
22 submissions. Any additional resubmissions that you
23 choose to do or need to do will increment by one.

24 You can resubmit a total of nine times per
25 quarterly report. So that's nine times in the death

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1 and injury, nine times on the production and
2 aggregate. Between the time of the end of the quarter
3 and the due date, you can resubmit basically
4 unfettered as long as it's been acceptable. You can
5 resubmit it again up to nine times if necessary. We
6 can't envision that but some instances certainly in
7 the beginning it might be that way.

8 But after the due date or certainly around
9 that date - it may be different for the first or
10 second quarter - the system will be locked. You'll be
11 notified that you can't submit. It will not accepted
12 it. You have to send a cover letter down to ODI to
13 explain why you need to resubmit whether it's just to
14 update the death and injury, additional information or
15 some substantive change such as you forgot warranty or
16 something like that. If we concur with that, the
17 system will be reopened and you can resubmit.

18 CHAIRMAN WEINSTEIN: One other point on
19 due date. We said in one of the reconsideration
20 notices which I'll reiterate it now to prevent clogs
21 on our system and clogs on your system. We plan to
22 work with manufacturers and try to spread out the
23 reporting of especially the larger manufacturers
24 around for example December 1st. We might ask some
25 manufacturers to submit a couple of days early and ask

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1 some to submit a couple of days late. Each of you
2 might have slightly different due dates. That's going
3 to be done informally not through any change to the
4 Code of Federal Regulations.

5 CHAIRMAN WEINSTEIN: This is the schedule
6 for reporting. You have this in the handouts. Just
7 walking through again so we're all on the same page
8 exactly when it is, we've given you the next four
9 quarters of the reporting aggregates down in the lower
10 right, 60 days for the first three reports. That's
11 the next two in 2003 and the first one in 2004. Then
12 the last one in July/September we'll be starting the
13 30 day count.

14 Given that everything has been accepted,
15 you come in. Everybody's happy and fine with it. Now
16 we start looking at the data and trying to make some
17 sense out of it. The first thing we're going to look
18 at is the death reports. For each death incident,
19 U.S. death incident not foreign death, we'll probably
20 be coming back to you and get the underlying
21 information if there is any. There will be an
22 informal contact. We just want more information to
23 make sure we're talking about the same incident and
24 that we understand what it is. It's probably one that
25 we've already gotten in our system. We're just going

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1 to get clarity on that. We've committed to doing that
2 on every U.S. death.

3 The other one is working title of Report
4 Clarification. If we get a response coming back and
5 you have some questions on how that data was filled
6 out by the manufacturer or we may have some concerns
7 of what the data represents, we'll be opening up a
8 report clarification. This is largely formal. It
9 will be done in writing.

10 It is not considered a defect
11 investigation by any means or any kind of
12 investigation by the Agency. It is simply a
13 clarification and/or request for EWR-related data. If
14 you give us the counts, we'll probably ask for the
15 underlying representation of that.

16 CHAIRMAN WEINSTEIN: Those will be
17 addressed to the primary contacts since a lot of them
18 will be just questions trying to clarify what was
19 actually submitted as opposed to looking into
20 potential or possible defects. We're going to be
21 making those communications back to the primary
22 contact. It will be up to each manufacturer to
23 arrange internally to the extent to which they want
24 their safety folks, their analytic folks, to be
25 involved in getting those communications and then

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1 responding to them. But we're not going to send those
2 to the same people we send our normal information
3 requests to as part of our investigations.

4 MR. WHITE: Then the last which we hope to
5 get out sometime in July or maybe in August, we're
6 going to have a guide and EWR compendium. It's the
7 complete unified Manufacturers Guide to EWR Reporting.

8 It will have in there the codes, the tables, the
9 templates, a walk-through on how they get filled out.

10 We'll have our data validation on how we want each
11 field to be reported in, what we're going to be
12 comparing it to and identifying it with to assist you
13 and us that the submissions come through without
14 trouble.

15 And it will walk through the electronic
16 protocols. There will be a separate guide developed
17 for each one of them. When you get your EWR account,
18 we'll be sending you a compendium with that. It'll
19 also be put out on the web.

20 These are the contacts. E-mails are the
21 best bet on any of these but general assistance
22 through ewrhelph@nhtsa.dot.gov. Legal issues go to
23 Chief Counsel. That's their phone number. EWR e-mail
24 submission if you're going to submit electronically to
25 the office that would go to odi.ewr. If it's an

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1 external communication or service bulletin or one of
2 those recalls or customer satisfaction campaigns, that
3 can be e-mailed in our tsb@nhtsa.dot.gov. If it's a
4 foreign recall or a substantially similar listing, it
5 comes in through frecalls. In the Regulations, it
6 currently identifies it as foreign_recalls. There was
7 trouble with that. It's frecalls.

8 Then last if you have questions or
9 concerns on how to submit to the SFTP or how that
10 protocol is going to work, send that to the Artemis
11 Helpdesk either by telephone or with their web address
12 (artemishelpdesk@volpe.dot.gov). That's there. That
13 should be the last page on your handout. With that,
14 any questions?

15 MR. WHEELOCK: Bob Wheelock from Ford
16 Motor Company. Jon, on the naming protocol, I'm a
17 little bit confused by the coding here, the S and the
18 P. Are you saying that if the report covers a single
19 vehicle model that we can just identify it as such?

20 MR. WHITE: Yes.

21 MR. WHEELOCK: Okay. Thank you.

22 MR. VASIDEVAN: Srini Vasidevan from
23 General Motors. I have a couple of questions. One is
24 on the submission format. In addition to .pdf and
25 .doc, we are also generating .html. Would you accept

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1 .html as a formal extension? It's electronic and
2 it's viewable on the browser automatically.

3 MR. WHITE: For a field report submission?

4 MR. VASIDEVAN: Yes, because we don't have
5 any hard copy documents. For example some of our
6 company vehicle evaluations, it's all on Excel
7 spreadsheets which we actually import into our tread
8 database. From the tread database, we are actually
9 generating the reports. Currently anything that we
10 are generating because of a non-existence for formal
11 field copy, we are creating those and creating them
12 .html.

13 MR. WHITE: Okay. The .html format for a
14 field report has not been suggested previously. We
15 have not considered it and not addressed it. Given
16 that we're accepting it in the other context, I can't
17 say whether we're going to accept it or not. We'll
18 look into that and should be able to get back to you
19 on that. It's likely that we will accept it.

20 MR. VASIDEVAN: The other question is
21 regarding the death and injury template. You
22 basically have system and component codes. Do you
23 consider the fire and rollover as a valid system in
24 component coding?

25 MR. WHITE: Yes, 23 and 24.

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1 MR. VASIDEVAN: Yes. This goes back to
2 the naming convention. In quite a few of our systems
3 actually things that we deal with for example our
4 Business Resource Center which deal with customer
5 complaints and any kind of a field report that they
6 generate, we are having them pass through with
7 whatever file name that they have. If we go back and
8 change the file name, then the kind of traceability
9 that we want to have internally is going to be lost.
10 So do you have any suggestions regarding the file
11 naming convention? Is it really pretty rigid?

12 MR. WHITE: What we propose here is where
13 we're going with the file naming convention. If a
14 field report doesn't meet that unless we change it
15 with some suggestion to change different than what it
16 is, we spent a lot of time trying to come up with
17 something that would fit and be useful and get maximum
18 utility out of it and the least amount of burden.

19 MR. VASIDEVAN: Yes. I think we will go
20 back and take a look more deeper into that.

21 CHAIRMAN WEINSTEIN: If I understand your
22 question if you're looking for some way that if you
23 have given a different kind of a name to a field
24 report and you want to have some way to link your name
25 to our name, we'll look at ways to do that. There's a

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1 limit though. If your file name has 40 more
2 characters, we don't want to add 40 characters because
3 that would just make it impossible for us. The
4 bandwidth is already in place. The amount of data
5 that's coming is already difficult. If you have
6 something that you want to suggest that doesn't impose
7 major burdens, let us know.

8 MR. VASIDEVAN: Yes, we will go back and
9 do that. I just want to clarify on the zip file
10 question because you said you want the field reports
11 to be compressed.

12 MR. WHITE: Yes.

13 MR. VASIDEVAN: Typically in a zip file,
14 we plan to put multiple field reports which will
15 follow this convention and put it in a single zip
16 file. So that's going to be acceptable.

17 MR. WHITE: Yes, you would use the file
18 naming convention, the first sheet, to get the zip
19 file identified because you're going to put on there
20 that it's a field report designator that it's an image
21 file. Then each individual field report contained in
22 that one would follow the field report file naming
23 convention.

24 MR. VASIDEVAN: Okay. Thanks.

25 MS. MASON: Hello, my name is Marcia

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1 Mason. I'm with Volkswagen of America. One question
2 we had was relative to the SFTP client. Is there
3 something that you specifically recommend that we use?

4 MR. WHITE: Yes, that question's come up.

5 We can't recommend a specific application. So our
6 proposal is we're looking into how we can get around
7 that. We may wind up providing a list of ones that we
8 know about and give you a choice on that.

9 MS. MASON: Well, right now, we're going
10 to use Windows PuTTY FTP client.

11 MR. WHITE: It's best to contact the
12 Artemis Helpdesk and get clarity on that.

13 MS. MASON: I can do that. Another
14 question is regarding the three character or more
15 requirement for foreign countries. I guess mainly
16 what we would like to ask is there anyway that we can
17 get NHTSA to define a code for those foreign countries
18 instead of having us write them.

19 MR. WHITE: No, we don't want to burden
20 the manufacturer. We don't want to burden ourselves.

21 We're not going to validate the countries. You could
22 put it on as England, Great Britain, United Kingdom or
23 whatever it might be called now. The main thing
24 that's important there is that it's written in text
25 and more than three characters. Now we know it's a

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1 foreign country.

2 CHAIRMAN WEINSTEIN: You can't write UK.
3 By having at least three characters, it tells us it's
4 a foreign country.

5 MS. MASON: Right. Okay. The other thing
6 is in order to modify the computer program that we
7 will use to generate the reports, we were wondering
8 how much time typically would be given between a
9 change in the reporting requirement and the new date
10 to comply with that?

11 CHAIRMAN WEINSTEIN: Do you know?

12 MR. WHITE: No. There's going to be a
13 substantial change to the file naming convention
14 that's going to really affect. Then we'd have to
15 reconsider it. If it's going to affect it to the
16 point where we have to do a do-around for the first
17 submission and work on it later or there's going to be
18 a regulatory change which has the same consequence.
19 We'll get it done as quickly as possible, the
20 resolution on that which means for us it will be a
21 matter of weeks. We'll have this thing locked down
22 one way or the other.

23 MS. MASON: A matter of weeks for us to
24 comply?

25 MR. WHITE: No, weeks for us to have the

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1 standards down and this is where we're going to be.
2 Then you'll have a couple of months to make it.

3 MS. MASON: However, enough time. One of
4 the other questions we had was does everything need to
5 be reported in upper case in the report. For some
6 reason, we have the understanding that we needed to
7 like on the tabs in the Excel spreadsheet convert
8 everything to upper case. But today I saw they were
9 in upper and lower.

10 MR. WHITE: Yes. As I recall, it's all
11 upper case. Again we'll have that down in the
12 compendium and it'll be more clear on that. I'm
13 pretty certain that it's upper case.

14 MS. MASON: Is there a limit on the size
15 of the report files for field reporting or any of the
16 others?

17 MR. WHITE: No, if it takes more than one
18 Excel spreadsheet, then use another sequence number.

19 MS. MASON: After the due date if we are
20 required to resubmit, I understand that we have to ask
21 for the approval to resubmit. How many days do we get
22 to ask after the deadline?

23 MR. WHITE: Resubmission is not linked to
24 the due date. When you find it necessary to resubmit,
25 that's when you're going to contact us. It could be

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1 that you just found out the VIN or what the actual
2 component code is. It can also be that you found out
3 that the data is wrong or we could have helped you out
4 with that. But at any rate, you'll need to re-notify
5 at that point so there's no tie to it. What will
6 happen there is once the resubmit is in purely if it's
7 a mandatory, we'll put that two week ticker on there
8 so we can keep track of it if there's a rejection in
9 the process again.

10 MS. MASON: But for after the due date
11 after we've submitted and we decide we need to
12 resubmit, there's no deadline on that number of days
13 we have once we know we need to resubmit and we ask.

14 MR. WHITE: That's right.

15 MS. MASON: I just have one final
16 question.

17 CHAIRMAN WEINSTEIN: Wait a second. If
18 the company finds out the VIN with respect to a
19 fatality claim that was not previously submitted,
20 there's a duty to resubmit. We expect that to be done
21 within a reasonable time. I don't know if the
22 Regulation specifies any particular number of days but
23 the company has a duty to give us that information
24 when they get it, not necessarily wait around for the
25 next quarterly submission. So then contact us and

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1 we'll get back to you. We expect them to do it
2 promptly. After we unlock the file, we expect the
3 company to resubmit. I'm not giving an specific days.

4 MS. MASON: That's what I needed. Thank
5 you. Then the final thing is the field report
6 submission. I heard that there is a cover letter that
7 needs to go on each field report. But today I was
8 looking at the field naming convention and I think
9 maybe that's really enough because of all that
10 information. Is there actually a coversheet that has
11 that information, a template?

12 MR. WHITE: One of the proposals early on
13 I think we had that there would a coversheet for the
14 field report submissions. We've done away with that
15 and you don't have to do it. The only time you would
16 use any of that would be with the transcript. That's
17 not a cover sheet.

18 MS. MASON: And that's if it can't be
19 reported so that file name has all the information
20 that the cover sheet initially intended to.

21 MR. WHITE: Yes. It's what we're going to
22 go with.

23 MS. MASON: Thank you very much.

24 MR. WHITE: Thank you.

25 MR. SADLER: Brett Sadler from Eldorado

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1 National. My question is we recently acquired another
2 line from another company a couple of years ago.
3 Obviously we won't have ten years back. Should we
4 state that somewhere or do we need to try to get that
5 information from the other company?

6 MR. WHITE: No, you'll be responsible from
7 the time you acquired that line. When you fill out
8 that EWR account information form, you'll designate in
9 there that you've just acquired this particular
10 company and you're reporting on it from this data in
11 this reporting category. That's sufficient.

12 Then when you report in your production
13 and your aggregates, field reports and the like,
14 you're just reporting it from that time you acquired
15 it on or whatever your legal arrangements are. If
16 you've taken over the warranty and responsibilities
17 for the product, then you have to modify that
18 accordingly so that it's going to encompass from the
19 time that you're responsible for the product on. I
20 hope that's clear.

21 MR. SADLER: Okay. My next question is on
22 all your reporting you keep talking about Excel files
23 but I was under the understanding that .xml was going
24 to be another option and that it might be discussed
25 today.

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1 MR. WHITE: Excel file. These templates
2 are templates. They're really not Excel files. They
3 have macros to them. You need to use them. You can't
4 just reproduce them in Microsoft Excel because it
5 looks the same it's going to work. It won't be
6 rejected. You can use .xml to submit as well as the
7 Excel. Those provisions right now are on the web.
8 And they'll be updated along with that.

9 Again we'll have that in the compendium.
10 If there's a need for it from the manufacturers, we'll
11 have another meeting to go over the IT issues and
12 product transfer protocols in probably August or
13 September. But in the meantime, you can call the
14 Artemis Helpdesk.

15 MR. SADLER: Okay, thanks.

16 MR. PAWLICA: Greg Pawlica, Ford Motor
17 Company. In referencing your instructions on the
18 naming convention, you have three report types, one of
19 them being field report. I'm not sure when I would
20 use that being that field report copies are being
21 reported. The naming convention is different and the
22 field report counts is in the aggregate data.

23 MR. WHITE: You use that when you're
24 submitting a zip file. That would be the designate
25 for the zip file.

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1 MR. PAWLICA: So the file extension should
2 say an additional .zip.

3 MR. WHITE: Yes.

4 MR. PAWLICA: Okay I just wanted
5 clarification.

6 MR. WHITE: That's fine.

7 MR. SHERMAN: Bryan Sherman, Porsche Cars,
8 North America, IT Department. On page two of this
9 handout, I just want to clarify the subtle variations
10 in the criteria of which records get submitted or
11 which records are applicable. It's basically a
12 question of whether the incident occurred in the
13 quarter being reported in conjunction with whether it
14 applies to a current production vehicle or historical
15 vehicle.

16 Maybe we missed this. Maybe it's always
17 been this way. My first question is Walter, our
18 clients manager, told me this is change to what we
19 previously knew and what we programmed into our
20 application which is already in testing. That's okay
21 if it's a change we'll accept that. I just want to
22 clarify for everyone's purposes (a) if this is a
23 change and (b) is it going to change again because our
24 understanding is that all information applied except
25 for historical data of course and production data that

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1 incidence only occurred in the previous quarter being
2 reported.

3 MR. WHITE: Not previous quarter.

4 MR. SHERMAN: The current quarter.

5 CHAIRMAN WEINSTEIN: It's not when the
6 incident occurred. It's when the claim or notice was
7 received.

8 MR. SHERMAN: Right and the variation
9 seems to be here now whether it applies to a current
10 production vehicle or whether it applies to a current
11 production vehicle and a preceding nine model years
12 vehicle. A good example here is consumer complaint.
13 If a consumer calls us or our call center and says "I
14 have a brake issue with 1993 Porsche 11", does that
15 apply?

16 MR. WHITE: No, it's outside the
17 production.

18 MR. SHERMAN: That's not what it says here
19 though.

20 MR. WHITE: But it's not one of the nine
21 preceding years.

22 MR. SHERMAN: But that's not what it says
23 here. Okay, that's different. That's what I'm
24 saying.

25 MR. WHITE: It wasn't current production.

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1 MR. SHERMAN: It's in a 10 year window
2 right now because we're in 2003. Let me change my
3 story here. In 1994 a Porsche 11 brake issue, we just
4 got the call in this quarter.

5 MR. WHITE: You would report it.

6 MR. SHERMAN: That's a subtle difference
7 from what we understood before. Again if it's our
8 error, I apologize but it is different. Our standing
9 in our company right now that's not how we're coding.
10 It's a subtle coding change we can make.

11 CHAIRMAN WEINSTEIN: I don't think it's a
12 change. I think that's what we always intended.

13 MR. SHERMAN: It just seems a little bit
14 different. Some of these don't seem real consistent
15 down the page. I just want to confirm that. If
16 that's the case, are these set in stone now?

17 CHAIRMAN WEINSTEIN: This is meant to. If
18 it's wrong, somebody tell us. But this is meant to
19 just confirm what the Regulation has said since July
20 10th.

21 MR. SHERMAN: That's the only reason why
22 I'm standing here asking that.

23 CHAIRMAN WEINSTEIN: Actually I take that
24 back. The Regulation language got changed a little
25 bit because it was pointed out that it was a little

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1 awkwardly phrased but we didn't change the substance
2 when we issued the reconsideration notice.

3 MR. SHERMAN: Our first reaction was it
4 seemed different. That's why I'm clarifying.

5 MR. WHITE: You're reporting on the
6 current production year or model year plus the total
7 production for the nine preceding. So you go back to
8 1994 and every model year, every production from 1994
9 up through what's ever been built through this
10 quarter.

11 CHAIRMAN WEINSTEIN: Actually, Jon, it
12 occurs to me now that we pushed it back to the third
13 quarter. Tell me if I'm right here. It may well be
14 that the vehicle produced - let's say a Boxter - you
15 might have gone to model year 2004 as of July 1st, the
16 beginning of that third quarter. In that case, it's
17 the preceding nine model years. You wouldn't report
18 1994. You would only start with 1995.

19 MR. SHERMAN: Good point.

20 CHAIRMAN WEINSTEIN: We normally think of
21 model years starting around October but I understand
22 for particular models it may have already started in
23 which case you go nine model years back for that
24 model.

25 MR. SHERMAN: Because we're starting to

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1 sell 2004 Cayennes so it's already kind of goofy.

2 CHAIRMAN WEINSTEIN: So the Cayennes would
3 only go back to start with model year 1995 which
4 aren't any in 1995.

5 MR. SHERMAN: Okay, great. Thank you.

6 CHAIRMAN WEINSTEIN: With that, I leave.
7 No reflection on you, Lyndon.

8 MR. LEE: Lyndon Lee from General Motors.
9 I have a number of questions here. First, Jon,
10 during the pilot workshop, they committed to .html
11 documents. I just wanted to remind you of that.

12 MR. WHITE: For document submissions?

13 MR. LEE: Yes.

14 MR. WHITE: Okay, I'm not sure that was
15 recorded because like I said I had not heard about
16 that before. I don't remember it from that.

17 MR. LEE: We did raise it then and we do
18 have e-mail communication from Volpe on that.

19 MR. WHITE: Okay.

20 MR. LEE: Death and injury templates, from
21 what I hear today, it sounds like they are separate
22 from the rest of the templates now. Is that a change
23 from what we had before when they were all in one
24 template?

25 MR. WHITE: Yes.

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1 MR. LEE: And that will be reflected on
2 the website and in the templates?

3 MR. WHITE: Yes.

4 MR. LEE: Then also a change to the update
5 process. It's no longer to be sent to you via e-mail
6 which you had instructed us earlier.

7 MR. WHITE: Say it again.

8 MR. LEE: Updates to the death and
9 injuries, on the prior workshop you told us to send
10 them to you.

11 MR. WHITE: That's right. It's an entire
12 new workbook and submitted on the SFTP.

13 MR. LEE: I just wanted to clarify that.
14 Will there be an additional pilot for transmission of
15 field reports?

16 MR. WHITE: There'll be accessibility
17 tests. At this point, we're not considering doing
18 another pilot. If there's a need expressed by the
19 industry, we may react to that.

20 MR. LEE: Our concern is bandwidth. Have
21 you increased your bandwidth over what you had for the
22 pilot?

23 MR. WHITE: Yes.

24 MR. LEE: Then one last question. In the
25 handout there was a substantially similar vehicle

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1 list. That's a new requirement here. Some of these
2 fields are new. They are not what we had submitted.
3 Will there be a resubmission required or is this for
4 November 1st submission?

5 MR. WHITE: It should be for November 1st.
6 We didn't have it out in place for December
7 resubmissions so that's fine.

8 MR. LEE: Okay. Thanks.

9 MR. OTT: Hi Jon. David Ott, Ford Motor
10 Company. I have two questions for you related to some
11 contacts that you had mentioned. One was death report
12 follow-up. You had mentioned that you were going to
13 follow up on each of those. What is the nature of the
14 contact that you would expect at the manufacturer for
15 that type follow-up?

16 MR. WHITE: It's basically the contact
17 that they ask what the information they know about,
18 particular incident beyond, what's been reported in
19 the aggregate. If they have a police report or they
20 know more than what's been reported there, you are
21 reporting a broad category, steering or whatever, to
22 the extent that it's known. If it's not, we'll be
23 done. It's informal. It's light. We're just trying
24 to get more clarity on the fatalities.

25 MR. OTT: In your mind, is that contact

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1 going to be the same one that you'd use for the IT
2 questions, the primary contact that we indicate to you
3 on our application?

4 MR. WHITE: It will be unless it's changed
5 by the manufacturer that he wants us to contact
6 someone else like the safety office or something.

7 MR. OTT: Okay. Then the follow-up to
8 that is the report clarification contact which is a
9 formal thing. Can you explain a little more what the
10 content or the nature of that request might be?

11 MR. WHITE: Sure. If it's on process,
12 we're going to walk through and ask where the numbers
13 came from, how the manufacturer filed it. That
14 depends on the nature of the submission. As far as
15 getting clarity on the information that's submitted,
16 what we're trying to do is largely get back to ?-

17 It's like an M&M bag and you're trying to
18 find out what's inside the M&M bag, what the number of
19 reds. So we will be going to underlying data if we
20 see that warranty is a concern. We would ask for what
21 was the stratification in the warranty. Where did
22 those claims come from? What are that breakouts?

23 MR. OTT: In your mind, is there an
24 intermediate step then between the RC and the IR that
25 may result?

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1 MR. WHITE: No. It would be a written
2 request. But it's not an investigation. It's not
3 close to it. It didn't come up before but yesterday
4 it came up about whether we'd do an investigation from
5 EWR submissions. No, we would never do that. But on
6 the other hand, we may well have a look and feel of it
7 to the manufacturer.

8 We have an existing data system in place
9 and our own procedures for doing that. EWR data is
10 only a piece of it now, a big piece maybe. So we
11 could still and we will be opening up investigations
12 based on that and EWR data may supplement it but was
13 not the initiating drive. To the manufacturers in
14 that regard, it looks like EWR drove it but it wasn't
15 but you would see that in the context of the resumes.

16 MR. GOODWIN: Hi Jon. Mark Goodwin, Ford
17 Motor Company, IT. Two quick questions. On the re-
18 sends, if we get a transmission error on FTP, does
19 that count as a send or is it at the point where you
20 do the file verification name and then the syntax
21 check that the first send counts? So if we get a
22 transmission error we know it's bad. We didn't get
23 the full file to start with. Can you resend without?

24 MR. WHITE: Yes, the only time the process
25 starts is when we get a successful transmission.

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1 MR. GOODWIN: Okay, good. Second question
2 is if I need to submit on behalf of a trust mart, say
3 a Mazda, if I have the manufacturer ID and the
4 password, will I have access to those storage areas so
5 that I can verify the file's there for Mazda? In
6 other words, what do I need to have access to the
7 Secure FTP areas for a given manufacturer?

8 MR. WHITE: To submit data?

9 MR. GOODWIN: If I'm Ford Motor Company
10 and I send a file, I want to go into the server and
11 look to see if the file got there. I can do that.
12 But if I send it for Jaguar, then what information do
13 I need?

14 MR. WHITE: The manufacturer user name and
15 ID and password.

16 MR. GOODWIN: Okay. That will do it.
17 Thanks very much.

18 MR. MANN: Jon, Kim Mann with the National
19 Association of Trailer Manufacturers. On the recent
20 Federal Register publication for the first time,
21 you've notified the trailer industry that they're
22 going to have to provide information about the types
23 of trailers that are involved when we are reporting
24 production data. There are a list of ten specific
25 types of trailers there. I have no idea where you

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1 came up with those types but for the vast majority of
2 the industry, none of those types represents the types
3 that are people predominantly manufacture. For
4 example boat trailers, horse trailers, utility
5 trailers, they are not included. So are we to just
6 put "other than" for the vast production that we are
7 responsible for?

8 MR. WHITE: At this point, yes.

9 MR. MANN: At this point. Now does that
10 mean we're going to come up later on with another
11 list?

12 MR. WHITE: We said in the final rule and
13 I think we've seen in most of the submissions since
14 that we'd be looking at this EWR Rule in two years and
15 reevaluating how we are doing it. It would certainly
16 expect in two years we'll have looked at that and see
17 whether the codes are appropriate or not. I don't
18 envision making changes before that timeframe but
19 unless there's some demand which is usually in
20 response to the industry.

21 MR. MANN: Okay. In the July 10th Notice,
22 I think there was a statement that manufacturers had
23 until August 1 to obtain a manufacturer ID number and
24 I might be slightly wrong on the date. Has that date
25 changed in light of the 90 day delay on the other

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1 compliance dates?

2 MR. WHITE: Yes. We will be beginning to
3 collect the accounts in July and will start making
4 user IDs available in August.

5 MR. MANN: That wasn't my question. The
6 question is by what date must the manufacturers
7 actually obtain their manufacturers ID numbers.

8 MR. WHITE: Thirty days before the end of
9 the quarter which would be November 30th.

10 MR. MANN: November 30th. Now with respect
11 to small manufacturers however you eventually define
12 that important term, will they be required by that
13 November date to obtain a manufacturer ID number and
14 account number?

15 MR. WHITE: Yes.

16 MR. MANN: Even if they have nothing and
17 they anticipate that there will be no need to report
18 in the future?

19 MR. WHITE: Was your question on the low-
20 volume manufacturers?

21 MR. MANN: Yes, I don't believe "small
22 manufacturers' have anything to do with volume
23 eventually. But let's assume it does.

24 MR. WHITE: Okay.

25 MR. MANN: The small manufacturer is

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1 required to have a manufacturer's ID number by the
2 November date that you just told me about. Is that
3 correct?

4 MR. WHITE: No. I'm sorry. If you are a
5 low-volume manufacturer and equipment manufacturer,
6 the only thing you have to report to us besides the
7 external communications and the foreign recalls, the
8 only thing that comes in over the SFTP or through the
9 website would be the death template. We don't want
10 these manufacturers to request an ID unless they have
11 some death incident to report. It would be a domestic
12 or foreign one.

13 MR. MANN: Okay, thank you. That answers
14 my questions.

15 MR. SELANDER: Jon, Steve Selander from
16 Warner Norcross & Judd. In your production aggregate
17 data on vehicle type for light vehicles, you have
18 something called "incomplete chassis". There's been a
19 NHTSA interpretation on Early Warning that says
20 "Incomplete vehicles are not vehicles for purposes of
21 Early Warning reporting." What is "incomplete
22 chassis" here? Is that interpretation still good or
23 what's the status of that?

24 MR. WHITE: Taylor, do you want to take
25 that?

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1 MR. VINSON: No, I don't.

2 MR. WHITE: He's not going to.

3 MR. SELANDER: Assuming that
4 interpretation is still effective, it doesn't seem
5 reasonable to be requiring reporting and production on
6 incomplete vehicles. That's my point I guess. The
7 second quick assumption is that DOT is retaining
8 earlier versions of all of these reports in their
9 computer system. So if you have a version 3 or 4 or
10 5, is the earlier version retained or not?

11 MR. WHITE: Yes, they are stored
12 electronically.

13 MR. SELANDER: Thank you.

14 MR. O'DALY: Jon, Russ O'Daly of American
15 Honda. My question goes to the fact that NHTSA will
16 be contacting the manufacturers on two distinct sorts
17 of purposes. One is the IT side which is whether it
18 comes through or not. The other one is for
19 information content purposes. We have two designated
20 contacts, primary and secondary. Can NHTSA consider a
21 primary and secondary for each of those channels
22 instead of saying "I'm going to contact this person
23 always first" and he may be the IT person? He may not
24 be the appropriate person for the content.

25 MR. WHITE: The primary and secondary

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1 contacts are what's known to Artemis and those are the
2 notifications that are going to be going out from
3 Artemis. Those should be your IT people. They are
4 going to be responsible for the transmission and the
5 formatting of those reports.

6 As far as the substantive issues and such,
7 you can have that as the safety office in normal
8 routine and we would communicate back with that.
9 That's on an individual manufacturer basis. I would
10 expect that the existing safety offices for example we
11 would be using them for the issues that the
12 manufacturer requested rather than going back through
13 the primary. The primary and secondary contacts are
14 for the IT and the responsibility for the submissions.

15 MR. O'DALY: Okay. Thank you.

16 MR. SADLER: Brent Sadler again from
17 Eldorado National. The incomplete vehicle brought up
18 question to me is the definition for make and models.

19 Since we take a chassis from Ford or Chevy and then
20 we build on it, is the make considered Eldorado. For
21 instance, we take a Ford chassis or a Chevy chassis,
22 it would be Eldorado and it might be called the Aero
23 Elite and then they'll have the 220 or 240 based on
24 the length. Which is our make and which is our model
25 to report? Where do we make that designation?

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1 MR. WHITE: The make would be Eldorado.
2 This issue of the model has come up before. If
3 there's no functional difference on the chassis that's
4 going underneath and you're trying to distinguish it,
5 you could make up an artificial model name such as
6 Ford Elite or something of that line, Elite Ford,
7 Elite Chrysler, whatever the chassis is.

8 MR. SADLER: But not one that we use
9 publicly.

10 MR. WHITE: No, the EWR data is not
11 intended to go that way.

12 MR. SADLER: Thanks.

13 MR. McDONALD: Hi Jon. Kevin McDonald
14 from Volkswagen of America. My question is with
15 regard to Artemis. Is Artemis going to be processing
16 the VOQs in the future? Are you going to retain that?
17 Are VOQs going to be processed separately outside of
18 Artemis?

19 MR. WHITE: How do you mean?

20 MR. McDONALD: I'm just curious on the
21 system itself. Is Artemis going to be basically only
22 for the early warning submissions?

23 MR. WHITE: No. Artemis is everything.
24 It's our whole computer system. It's superceded our
25 existing system.

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1 MR. CAMMISA: Jon, Mike Cammisa, AIAM.
2 There were a couple of slides that had some
3 information and it went by pretty quick. Are you
4 going to put those slides in the Early Warning section
5 of the website or in the docket?

6 MR. WHITE: Yes. They'll be in the docket
7 with the meeting and some representation of them at
8 least will make their way into both the compendium and
9 on the website. Any other questions? That's it.
10 Thank you all. Off the record.

11 (Whereupon, the above-entitled matter was
12 concluded at 10:45 a.m.)
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S-E-S-S-I-O-N 2

1:04 p.m.

CHAIRMAN WEINSTEIN: On the record. Good afternoon. I guess we'll get started now. Welcome. This is the last in a series of four meetings we've had to explore our Early Warning Regulations. My name is Ken Weinstein. I'm the Associate Administrator for Enforcement with NHTSA. With me up here is Jon White who is the head of the Defects Assessment Division within the Office of Defects Investigation and Bob Squire on his staff. To my left are Taylor Vinson and Andrew DiMarsico, who are in NHTSA's Chief Counsel's Office. They've been involved in the development of the Regulations.

As you all know the TREAD Act authorized and directed NHTSA to develop and promulgate regulations requiring manufacturers of motor vehicles and motor vehicle equipment to provide NHTSA with information about potential defects to help us identify those defects or potential defects and decide whether to investigate possible defects. We met the very stringent, very optimistic time requirements of the statute and issued our final rule last July.

Since that time, we've issued two amendments to that rule on reconsideration in response

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1 to petitions for reconsideration, one which we call
2 Notice 4 because that's the way the Federal Register
3 refers to it. It was issued back in April. Notice 5
4 was just issued last week. We have a couple of
5 remaining issues from the petitions for
6 reconsideration that were filed. We hope to get those
7 resolved in the very near future.

8 Primarily because of delays in getting out
9 the request for reconsideration and some other
10 interpretative issues, we delayed the period
11 essentially for three months, one calendar quarter,
12 both the applicability period and the reporting
13 requirements. We made some other changes to the
14 dates, some other extensions. But essentially we
15 pushed everything back at least 30 days.

16 The other thing I would mention is that
17 over the last few months we issued numerous
18 interpretations of the Early Warning Rules. Those are
19 issued by the Chief Counsel's Office. They're
20 available on the NHTSA website under EWR and search
21 for "Interpretations". As new interpretations are
22 issued, we'll be putting them on that website to guide
23 the regulated community in at least what we think the
24 Rules mean and what we expect the regulated parties
25 to do under the Rules.

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1 Jon is going to give a presentation
2 involving primarily describing what the requirements
3 are and the how-to and focused on the process of
4 submitting Early Warning reports. Then after that
5 questions will be accepted. If you have questions,
6 come up to that microphone in the middle there, state
7 your name and the entity that you're with or
8 representing. Then we'll do our best to answer those
9 questions.

10 As I've said at prior meetings, we'll do
11 our best to give those answers but the answers given
12 here do not bind the Agency. Any formal
13 interpretations have to be made by the Chief Counsel.

14 They are normally only made in response to written
15 requests. So to the extent that you disagree with and
16 you want us to formalize it, you should write into the
17 Chief Counsel's Office. With that, I'll turn it over
18 to Jon.

19 MR. WHITE: Good afternoon. We'll go over
20 the agenda first. We'll be going through relatively
21 quickly the 579 requirements. There has been some
22 changes to Subpart A. Primarily there's been two new
23 terms added "control" which affects the manufacturer
24 and "handles" which affects the child seats. A number
25 of other terms have been changed and modified.

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1 They'll be found in the Notice 5 which came out last
2 week.

3 Then there's external communications and
4 foreign recalls as part of Subpart B and substantially
5 similar vehicle listings. I'm going to go through
6 what's known as EWR reporting and that's Subpart C,
7 production and warranty, death and injury, one-time
8 historical and everybody's favorite, field report
9 submissions. Next.

10 Then we'll go through the manner of
11 reporting including manufacturer ID, schedule of
12 reporting, post data review and our compendium. This
13 is in the handouts. This is just a brief outline of
14 what all the reporting requirements for all the
15 different reporting categories are.

16 External communications. One of the first
17 requirements, it's a monthly submission, five days
18 after the end of the quarter. It's really made up to
19 two parts. The first part is existing requirement
20 under 573.8 that you've been complying for 30 years
21 now with the regulation. The second part added to
22 that is customer satisfaction campaigns, product
23 improvement and the like that affect the repair and
24 replacement of one of your products that you send out
25 to more than one customer, purchaser or

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1 manufacturer/distributor. That reporting has been
2 changed to begin with July 1, 2003.

3 The foreign recalls, it's basically a
4 daily submission. It's within five days of decision
5 by either the company or the foreign government to
6 issue a foreign recall in a foreign market. You're
7 obligated to report it to us and identify the
8 substantially similar vehicle.

9 Annually, every vehicle manufacturer who
10 sells vehicles in a foreign market that may be
11 substantially similar has to provide to us a listing
12 of the substantially similar vehicles. There's a
13 guide there in the handouts for you. It's the simple
14 spreadsheet identifying a substantially similar
15 domestic U.S. product versus the foreign product and
16 the country it's in.

17 Under the Early Warning, we have several
18 templates in there that you've seen. You're going to
19 collect production at the end of the reporting quarter
20 and it's for the nine preceding model years plus the
21 current year. The number of property damage, the
22 number of consumer complaints, warranty and field
23 report counts.

24 There's a separate workbook now. They
25 were all together but now it's been broken out.

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1 That's fatality claims and injury claim incidents.
2 Those again are incidents on death and injury that may
3 have occurred during the quarter on product that is
4 nine model years plus the current.

5 These are the templates. It's important
6 to note on this particular template that you have to
7 fill them all in but you want to be sure to look for
8 this version number. It has to be a 1.2 or higher.
9 Those templates shouldn't be available on the web
10 right now. They should have been removed and they'll
11 be replaced next week. It should be 1.2 or higher.
12 Make sure that you have that. You may have 1.0 or 1.1
13 or 1.2.

14 This is the production. This is probably
15 the most important template for us and should be for
16 you. In this, you're going to identify the make,
17 model, production year or model year. That's the
18 minimal specificity. It has to be there for all the
19 products during the period. This type, that's a new
20 criteria. We just put that in Notice 5 for all the
21 vehicle manufacturers except for motorcycles. Light
22 vehicles already had it in before and we added it to
23 bus, medium, heavy and trailers.

24 Then the fuel system and brake system.
25 You're just going to categorize in there your

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1 production by what type of brake. We have the codes
2 in the handout with you. It will also be out on the
3 web. It'll also be in our compendium and there will
4 be an explanation and walk-through on all of them and
5 they're defined in regulations as well. This is the
6 first production template for trailers. Again type,
7 brake system, missing fuel system for truck but it
8 would be the same in both. They follow the same
9 format.

10 This is a representative aggregate
11 spreadsheet. This one is for consumer complaints. It
12 could be for property damage, warranty or field report
13 counts. Again you're putting in there the make,
14 model, model year. This is critical.

15 If this make, model, model year doesn't
16 exactly equal what you provided us in the production,
17 it will be rejected. It has to be the same. What you
18 told us in production has to be the same thing you're
19 reporting on in other aggregate templates. These 24
20 are basically medium and heavy and buses would report.

21 They are substantially less for trailers and
22 motorcycles.

23 Death and injury template. Again they're
24 split out and separate. Make sure that it's version
25 1.2 or higher.

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1 There has been some question issued on
2 these fields. I want to go over them. This first one
3 is ID. It's the row number, the fatality or injury
4 incident that you're going to report to us starting
5 with one and going on. It's incremental. It starts
6 with one at each new quarter and just continues
7 through it. It's just the row ID.

8 The next field, manufacturer unique ID,
9 that's your field. You can put in that whichever you
10 care to. We haven't really come up with a size on
11 that field limitation. Presumably it will be
12 something on the order of 20 or 25. It may as large
13 as 40. Forty supersedes an ID field.

14 The next three is the make, model, model
15 year specificity. Again it has to match your
16 production. If it doesn't match production, that
17 submission will be rejected. And if it's a foreign
18 product it has to be the U.S. product that's
19 substantially similar. Telling us about what the name
20 and the make and the model of the foreign vehicle is
21 not acceptable here. It can only be what the U.S. one
22 is. We're going to validate against that. We will
23 know if it's a foreign one because how you're going to
24 enter in the state or country and also the VIN for the
25 matter because you can put the real VIN of the

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1 affected vehicle.

2 CHAIRMAN WEINSTEIN: One minor
3 clarification. If there were several U.S. vehicles to
4 which the foreign vehicle is substantially similar,
5 just put any one in because it may well be various
6 models. Put whichever one you think is the most
7 similar or the largest production of variety of
8 similar vehicles.

9 MR. WHITE: That's true. The incident
10 date is a VIN. If you don't know the VIN, it can be
11 left blank at the beginning. It's one of the few
12 fields that needs to be updated. If it's not, it's a
13 mandatory update. It's one of the reasons why we
14 split off this template. Also we'll get to the system
15 codes. If you have only a 99 in there, which means
16 unknown, as soon as you know what the true code is,
17 you have to resubmit.

18 The VIN has to be whatever the effective
19 vehicle is if you know it. The incident date is a
20 calendar date field. It will have whatever the
21 criteria is for that but it should be year, month and
22 day.

23 CHAIRMAN WEINSTEIN: Not that way. You
24 said month, day and year.

25 MR. WHITE: We'll have it straightened out

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1 and clear on the compendium and in the rules that go
2 with this. Number of deaths, number of injuries,
3 these are self-explanatory. State or country. The
4 state or territory if it's a U.S. death or an injury
5 it's only the two character U.S. Postal Code. We put
6 those out on the web. We're going to check against
7 that. That's our validation on that.

8 If it's a foreign country, then you have
9 to write it out in text. It has to be three
10 characters or longer. We're not going to validate on
11 that. The fact that it's three characters or longer
12 indicates to us that it's a foreign country. We don't
13 care whether you tell us it's the United Kingdom,
14 Great Britain, England, Ireland.

15 CHAIRMAN WEINSTEIN: No abbreviations.

16 MR. WHITE: But no abbreviations. This
17 next one is SysCompA. That's critical. When you
18 start to fill in this, we're going to start from the
19 left SysCompA and work towards the end. So whatever
20 goes in SysCompA has to be representative of the
21 incident that you're reporting on. We don't really
22 care what component it is, one through 24. Whatever
23 one it is, it is. It doesn't matter.

24 You're not saying that it's the most
25 likely occurrence or whatever. We're just assigning

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1 it that. You're just assigning it where it is. If
2 you have other ones to do and you put a 98 or 99 up
3 front in that first one, then it would be rejected and
4 we'd start over again with that. So it has to be a
5 non-98 or 99. Ninety-eight is not one of our
6 components. Ninety-nine means you don't know which
7 component it is. Then you're going left to right.

8 If on the other hand the only code that
9 you have is a 98 or 99 that's acceptable. Put it in
10 there. Again if it's a 99, you're going to update the
11 template. When you update templates such as this one,
12 not just that row or that cell that you're going to
13 replace, it's the whole template.

14 One other thing is in the aggregates for
15 example if you've left out a particular cell for make,
16 model, model year, you're talking about the 1999
17 Bullrider and you have 99 in the model year and it's
18 in the warranty and you don't have any claims against
19 steering for it, it has to be a zero in there. It's
20 not a blank. No blanks in the aggregate templates.

21 If on the other hand that whole row on
22 that 1999 Bullrider you have nothing to report for
23 warranty and nothing against steering or suspension,
24 brakes, system brakes of any kind, then you can either
25 fill in the row with zeros or delete that row in that

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1 template. You still have to have all the production
2 identified. You can't leave out that production
3 because you don't have anything to report on it.

4 CHAIRMAN WEINSTEIN: But, Jon, on this
5 template, if you don't know the VIN, you just leave it
6 blank, right? If you don't know the state or country,
7 you leave it blank, right?

8 MR. WHITE: Right. Historical data.
9 Historical data has been pushed back. We're going
10 from July 1, 2000 through June 2003. There will be
11 reporting on 12 quarters. We've given you a guide in
12 the handout. It's on the next chart. You're asking
13 for production and warranty and field reports. It is
14 a standard template that we have for you. Just don't
15 fill out the property damage and consumer complaints
16 unless you want to report them but it would be
17 rejected. You can't do that. It's the production,
18 warranty and field reports and only the counts and no
19 field report submissions or warranty.

20 This is what it's going to look like.
21 Horizontally is your product you're going to report
22 on. Vertically it's the quarter that you're going to
23 be reporting incidents that occur in that particular
24 quarter.

25 Field report submissions. They have also

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1 been delayed one quarter and beyond that. We've
2 started reporting in that for the first quarter of
3 2004. The first report we've also delayed the
4 reporting date. Instead of being concurrent with the
5 aggregate data, it will be 30 days after that
6 submission. In the counts, you include dealer reports
7 but in the field report submissions, the dealer
8 reports aren't included. You're just giving what the
9 assessment was.

10 In order for a report to be submitted, it
11 has to meet these three criteria. It has to be part
12 of the production that you've reported on your
13 production template. It has to be issued during the
14 reporting quarter or you knew about it or received it.

15 It has to affect at least one or more of the
16 applicable component codes for fire or rollover. We
17 don't want a 98 or 99 field report. It wouldn't give
18 any knowledge to us.

19 By definition, the field report has to be
20 an assessment of an alleged failure, malfunction, lack
21 of durability, other performance problems on a
22 manufacturer's product by either an employee or a
23 representative of that company.

24 An issue came up over attachments. We
25 have made provisions in the file naming convention

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1 which we'll get to and you'll see it in the handouts.

2 In terms of the actual submission, you're not
3 obligated to provide the attachments. You have to
4 designate that this field report has an attachment.
5 That has to be clear and provided. An attachment on
6 the other hand cannot be a stand-alone field report.
7 In other words, the attachment really was a follow-up
8 to the existing field report or an earlier field
9 report. It's not an attachment, you have to submit
10 it. The attachments we're contemplating there are
11 something like photographs or test data or something
12 of that ilk.

13 When we get field reports, they have to
14 have a distinct name. We'll go through it again in
15 the file naming convention. That's whether they are
16 submitted electronically or they're submitted in hard
17 copy. Each one has to be distinct. In that file
18 name, it's going to identify the products, the product
19 years that are affected and the reporting component.

20 Our acceptable formats are .pdf, .tif,
21 .txt, Microsoft Word .doc and .rtf and .jpeg. There
22 was some question earlier about .html. We haven't
23 ruled on that but we'll probably accept that. Because
24 we're limiting these formats to these five plus
25 possibly six plus the .html, there may be instances

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1 where a field report is untransmittable. You can't
2 sent it to us. You can't reproduce it in hard copy
3 and you can't send it electronically. In those
4 instances, we have a field report content transcript
5 which will walk through again what the product is,
6 model years affected, nature of it, the components
7 affected and basically what was under discussion. That
8 will be available on the web. It will also be in the
9 compendium.

10 The manner of reporting, basically the
11 only thing you're going to need is a manufacturer ID,
12 password and user account to submit over the SFTP.
13 The only files acceptable there is either the
14 production and aggregate or death and injury for
15 electronic field reports. If you're going to do
16 external communications or foreign recalls, you can't
17 send them over the SFTP. It'll be rejected. You have
18 to send those to ODI either by mail or e-mail. We
19 have contact points for those.

20 A customer satisfaction campaign would be
21 sent to TSB@nhtsa.dot.gov. Foreign recalls would be
22 sent to frecalls@nhtsa.dot.gov instead of
23 foreign_recalls which it says in the Regulation right
24 now. We had problems with that. It doesn't work. We
25 had to revise it. Anything else goes to

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1 odi.ewr@nhtsa.dot.gov.

2 If there's an explanatory, voluntary,
3 mandatory coversheet in some instances, we'll get
4 through that if you're going to need to submit a
5 coversheet to the Office to explain what's going on.
6 We may choose to send in a coversheet to explain why
7 some data is suddenly gone some place unexpectedly.
8 Those would be sent to ODI either my mail or e-mail.

9 This is an example of what the file naming
10 convention is. This is quintessential given it to you
11 in the coversheets. We're not strictly whetted to
12 this but we're 99 percent there on this. The file
13 naming convention for everything coming in over the
14 SFTP has to fit this.

15 The first six characters which is your
16 manufacturer ID. The second character is the type of
17 reporting category and these are the codes that would
18 be appropriate. Next is the two digit calendar year.

19 Next is the reporting quarter. The next is a version
20 number. Hopefully nobody will ever come close to
21 this. We're only allowing nine per quarter to start
22 with on file submissions. It could get into this with
23 other instances with other reports such as the field
24 reports.

25 The next is the type. Again the aggregate

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1 is either aggregate data or the death and injury and
2 then field report the image files. Then the sequence
3 number. That sequence that's a lot of Excel
4 spreadsheets. That's what that means. You've
5 exceeded it when the 99,000 times. The acceptable
6 formats right now that we're accepting is Excel, .xml
7 or zip files for the field reports.

8 Now the field report naming convention is
9 you submit the field reports. You can zip them
10 together under a file. You have to use that first
11 file naming convention. For each individual field
12 report, you have to identify each one whether it's
13 submitted electronically or in a hard copy with a file
14 name. It'll be distinct.

15 CHAIRMAN WEINSTEIN: I just want to
16 clarify what we're doing here. It became clear that
17 if people were just going to submit field reports in a
18 pile if let's say they were hard copies, every time we
19 wanted to look into a particular issue, we would have
20 to leaf through the whole pile. We needed a way of
21 being able to find a particular question but whether
22 there were any field reports on a model year 2002 of a
23 particular model to deal with suspension. That's why
24 we needed a naming convention.

25 We spent a lot of time trying to develop

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1 one and we've come up with the one that's in the
2 handouts up on the board. As we've told the people at
3 the other meetings, these copies of these field
4 reports don't get submitted until a little over a year
5 from now dealing with the first quarter of 2004.

6 We remain open to listening to better
7 ideas as long as it's understood what our objectives
8 are and that we need a way to be able to identify
9 field reports and to search for them and to have them
10 correspond to other things that we're looking at. So
11 if anybody has better ideas not necessarily today
12 please bring them to our attention promptly and we'll
13 think about ways of finalizing this naming convention.

14 I guess it's another way of saying don't start naming
15 things to this quite yet, not that you'd have any
16 reason to since it doesn't apply until the first
17 quarter of 2004.

18 MR. WHITE: We want to get this ironed
19 down as quickly as possible so it's a matter of weeks
20 for us and for you.

21 CHAIRMAN WEINSTEIN: Because we have to
22 program the computer. So we need it fairly soon but
23 you don't have to actually start doing anything with
24 it for awhile.

25 MR. WHITE: Now we're starting off. The

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1 first character defines whether it's a single model.
2 It's the only thing this field report is going to talk
3 about or whether it's going to talk about a single
4 platform application which has no meaning to you. You
5 don't have platforms so that will be a blank. You
6 won't have the P. M is for multiple models and then T
7 would be used if you have to use a transcription. We
8 don't care if the transcription affects one or more
9 models. If it's a transcription of a field report, it
10 just gets a T.

11 Then the name, you would start with the
12 field report name. If it's more than one model, you
13 just give one of them. It's a truncation. No
14 abbreviations. Just continue it out four or five
15 characters.

16 The next four characters are a given for
17 the year. The first two are the calendar year that
18 the product started with. The next two are for the
19 ending date.

20 Then you can select up to five different
21 components from the reporting categories. It lists
22 each one of them in sequence with no priority to it.

23 Then the next one is a version number.
24 It's conceivable that you can have against one
25 particular model, model year, multiples on steering or

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1 suspension. That's where that's coming from.

2 The last one if you're going to identify
3 if there's an attachment. You're going to submit to
4 us the attachment, not just mark them on the actual
5 field report but you're going to provide one or more
6 photographs or whatever comes with it as an
7 explanatory.

8 CHAIRMAN WEINSTEIN: Jon, I'm actually
9 asking this question because I was confused this
10 morning. If you are submitting an attachment, then
11 you put number one or number two depending on how many
12 attachments it is. If you're not submitting an
13 attachment, you still have to put in whether there are
14 attachments, a yes or a no.

15 MR. WHITE: Right.

16 CHAIRMAN WEINSTEIN: But that's not
17 written up there yet. We'll have that. We're going
18 to change that, right?

19 MR. WHITE: Yes.

20 CHAIRMAN WEINSTEIN: You'll put a Y in
21 that spot.

22 MR. WHITE: We're going to have to do
23 something because you're right. We have to change it.

24 It will become now two characters instead of one
25 because they have to come with a yes or no and then if

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1 it's a yes then how many attachments.

2 CHAIRMAN WEINSTEIN: Well if you're
3 submitting attachments, you put the number there. If
4 the document that is being identified is an attachment
5 and it's the first attachment, you put one in that
6 code. But I'm talking about the original field
7 report. We'll want a yes or a no whether there are
8 attachments or not. Whether you're submitting or not,
9 we need to know whether there are attachments so if
10 we're following up we know whether to ask you for
11 attachments. We'll have to fiddle with that.

12 MR. WHITE: Yes. Manufacturer ID
13 management. ODI is going to assign to each of you the
14 manufacturer ID and EWR user account name and a
15 temporary password. Many of you have already
16 requested those. We have not made any assignments to
17 them as yet. Some of you participate in our January
18 testing of the system. Those EWR and manufacturer IDs
19 are valid. We'll just add two zeros in front of them
20 because they were at four characters at that time and
21 now they're at six. But you'll have to receive a new
22 EWR account name and password.

23 Everyone will get new account names and
24 passwords but no one will get them until we get an EWR
25 account application form filled out by each company.

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1 The form will simply be a spreadsheet. It will be put
2 out on the web and it'll be sent out to each
3 manufacturer. Those that we've already received
4 request we'll send them out to those and the others
5 will get it upon request.

6 Basically it's going to identify the
7 manufacturer and the primary and secondary contacts.
8 It will also ask what the reporting categories they
9 are going to be involved with and who the divisions or
10 subsidiaries might be that they're going to represent.

11 If there's a parent company, we want to know that.
12 If the subsidiary or division was acquired within the
13 last nine years within the reporting period, we would
14 want to have them identified so that we'd know that
15 you're going to be reporting on this segment and not
16 these other models. We get some explanation when we
17 get the data coming in. We won't have to go back and
18 bug you on that. We'll have it in the system.

19 Also we'll have a validation and
20 verification protocol for each primary and secondary
21 contact. That's to ensure between you all and us that
22 we're talking to the right person. We haven't
23 finalized that. Our current thinking is to give you a
24 series of questions, straight forward, simple,
25 discrete questions. You give us an answer to two or

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1 three of those in that group. That will be recorded.

2 Each time during the validation and verification we
3 may ask one or three of those questions.

4 We'll be putting those things out by the
5 end of the month and we'll start receiving the account
6 applications in July. We'll begin issuing the
7 manufacturer IDs in August. When you get that, you
8 have to take that temporary password that we're going
9 to give you, go to the secure socket layer ("SSL") and
10 enter the EWR manufacturer accounts which we'll have
11 developed by then on our website and change the
12 password. We'll set the instructions up. They'll be
13 in the compendium. They'll be in the letter that
14 we're going to give back to you identifying what your
15 password and user ID are. However, you're obligated
16 to make that change.

17 At the same time, we'll give you
18 instructions on how to test for accessibility. You
19 want to make sure that we communicated the right user
20 ID and manufacturer ID and account name and that there
21 are no problems with it. If you don't change the
22 password, you won't be able to get into the SFTP site.

23 During the quarter if you've forgotten the password
24 for whatever reason in the next 30 days because that's
25 about all the time you're going to get to use because

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1 you have to change it each quarter, you can contact
2 ODI and we'll go back through it. If you make the
3 change yourself, you can go back to the website and
4 make the change at the secure site.

5 Once we've gotten through that and the
6 passwords have been issued and accepted, you start
7 your submissions. There are going to be two levels of
8 validation on each of the submissions over the SFTP.
9 The first one is to make sure the file name is
10 correct. The second one is going to be for the file
11 structure. No nulls in the aggregate. Everything
12 meets the production standard.

13 When you make your contact with Artemis
14 through the SFTP, it's entered into the system. When
15 Artemis makes the first cut on the file name, you'll
16 get a response. It will either accept it or reject
17 it. There will be an e-mail notice back to the
18 primary and secondary contacts.

19 If it's rejected, you'll get a notice
20 saying it's been rejected. Then we'll tell you
21 exactly what it is in that that failed. Which part of
22 the validation was suspect. After the notice, each
23 manufacturer is going to have a two week maximum that
24 we'll expect to hear back from you. It should be very
25 simple, straightforward. Some of the file naming

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1 convention, it shouldn't be any trouble with that, the
2 general file name. We expect a response back sooner
3 than that. We have a clock on there to make sure
4 nobody drops off the face of the earth.

5 You can resent assuming you're not
6 successful. It's not acceptable. You have three
7 times to go through it before we're going to lock down
8 and a message sent to ODI and we'd have to make
9 contact with you to reopen it and discuss with you
10 what the issues are, what the problems are if there
11 are any and make sure we're all on the same page.
12 Then you're good to go for another three more times.
13 The cycle starts again. If you're not successful,
14 we'll go back through the process.

15 CHAIRMAN WEINSTEIN: Every time I see this
16 slide, I start thinking. We don't expect people to
17 have to try six times and keep waiting two weeks
18 between each time. If there's a problem, you will be
19 contacting I'm sure the Artemis Helpdesk and we'll try
20 to get it worked out really quick. It's important to
21 get this information in a timely fashion. We realize
22 the first time there might be some difficulties but we
23 certainly don't expect it to drag on for weeks at a
24 time and have to reopen the system and then lock it
25 down again.

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1 MR. WHITE: I realize the first one's
2 going to be for file naming so that one's straight
3 forward. You'll get a response back fairly quickly
4 from Artemis. When you get an acceptance one on that,
5 it'll tell you that your file validation will be
6 within the next 24 to 48 hours. So that one may be a
7 while but it's a little bit different. You'll get an
8 attached sheet on there that will go through each one
9 of what's wrong with it.

10 When you finally get an acceptance, the
11 file name and the file itself, you'll get a version
12 number for that. You'll assigned a version when it
13 comes in. That will be one. Everything is one
14 whether it was the aggregate or the death and injury.

15 They are all version one. If there is any
16 resubmissions that may be necessary, you're going to
17 increment that by one or else it's going to be
18 rejected. You have to renumber it.

19 Each document coming in, each aggregate or
20 death and injury report can be updated, resubmitted
21 nine times with nine version numbers on there. We
22 don't expect anybody to do that but it's possible.
23 We've left it open that way. Between the time the
24 quarter ends and the due date, you can resubmit if you
25 find that the data you submitted was incomplete,

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1 incorrect, missing without being unencumbered by us.
2 You can do it. The only thing you have to do is
3 change the version number each time.

4 After the due date, the system will be
5 locked down. Presumably in the first timeout, we'll
6 be extending that a little bit. Basically it's going
7 to require a cover letter to the Agency to explain
8 what the problem was and what needs to be corrected
9 and why. If we concur with that, then the message
10 will be back up to Artemis to open up the system for
11 you and you can resubmit.

12 Each of you have this in your handouts.
13 This is a general schedule of when the due dates are
14 for all of the various documents. Again that first
15 one, the foreign safety recalls, that's within five
16 days of the determination. External communications
17 are five days within the end of the month.

18 The substantially similar vehicle listing
19 is annually. It would be by November 1st. The
20 aggregate data is 30 days from the end of the
21 reporting quarter but for the first three reports it's
22 last two in 2003 and the first one in 2004 you have 60
23 days. The due dates are there. December 1st for the
24 third quarter, March 1, 2004 for the second quarter.
25 Fourth quarter of 2003. Then we put the fourth one

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1 there to distinguish that it's a factor of 30 days.
2 So that one will be due on July 30, 2004.

3 Death and injuries follow the same format.
4 Field reports again, starting with the first quarter
5 in 2004 and the first report then is due 30 days.
6 After the 60 day file completion it would be July 1,
7 2004.

8 CHAIRMAN WEINSTEIN: I don't know if it
9 came up this morning. I know we mentioned it
10 yesterday. On historical reports, what happened is we
11 pushed everything back a quarter. When we made the
12 extension, it turns out it was December 31, 2003. I
13 know at least a lot of the domestic major light
14 vehicle manufacturers are off for two weeks around
15 that time. We've pretty much decided that we're going
16 to extend that until January 15 so people don't have
17 to come running back from vacation.

18 The other thing about due dates at least
19 with the larger manufacturers is we're going to try to
20 stagger the due dates around the periods that they're
21 due. Like December 1st, we're going to ask some people
22 to submit things a couple days early and let some
23 other people do a couple days late so we don't have
24 everybody submitting reams of electrons on the
25 afternoon of December 1st. But that's going to be done

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1 informally rather than through a change in the Code of
2 Federal Regulations.

3 MR. WHITE: Once everything is kosher and
4 we have everything in, accepted, rejected,
5 resubmissions, when looking at the data, we've
6 actually started looking at it, the first thing we're
7 going to go through is the domestic death incidents.
8 We'll probably contact each of the manufacturers over
9 every U.S. death, get the underlying information
10 beyond what was reported to us in the aggregate.

11 It will be done informally by telephone
12 largely and there may be nothing more to report from
13 it from you but there may be other information such as
14 you reported steering but what part of the steering
15 was actually there. We need to get clarification that
16 we're talking about the same vehicle and such. That's
17 all it is. We made a commitment to do that. That's
18 where that will come from. That's informal. You can
19 expect that.

20 The other one is we have a working file
21 name of that "Report Clarification." That's more
22 formal. It will be in writing. It's to go over if
23 you've gotten your response in and gone through it and
24 we have questions about either how the data was
25 composed and where the numbers came from or what made

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1 up those numbers. It will be a report clarification.
2 It will be in writing. It's largely going to be
3 asking for the process of how you got through it or
4 it's going to ask for the underlying EWR related data
5 such as you gave us 2,000 warranty claims for
6 steering. What made up those 2,000 complaints? It's
7 some way of getting at the underlying data.

8 Consequently we don't consider this to be
9 a NHTSA investigation. It's like an extended review.
10 It would be another template. We didn't want to
11 burden the entire industry with reporting all this
12 stuff of the underlying numbers. So this is on a case
13 by case basis.

14 CHAIRMAN WEINSTEIN: Those requests for
15 clarification will go back to the primary contact that
16 each company has identified, not necessarily to the
17 safety office or whatever that we normally have our
18 contacts with if we're doing our defect
19 investigations. It's up to each company to resend a
20 need-to or want-to to make sure that their Artemis
21 contact, their early warning primary contact, talks to
22 their safety people.

23 MR. WHITE: Compendium. Because this
24 Regulation is quite involved, there's a lot of
25 requirements. There's a lot of policies, procedures,

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1 tables, codes. We're going to put together a complete
2 unified guide to help the manufacturers, you, do your
3 EWR reporting so that we're all on the same page. Our
4 intent there is to go through the regulations and make
5 sure that everybody is on the same page with that.

6 What our data validations are going to be
7 so that makes that as easy as possible with no
8 problems. We're all talking from the same piece of
9 paper. That's what that's about. We should get that
10 out next month. There'll be one for vehicles, one for
11 tires, child seats and the below-threshold vehicles
12 and another one for equipment manufacturers. It'll
13 walk through the electronic file transfers, how do you
14 get the passwords, the whole exercise.

15 Contacts. This is the last page of your
16 handout. Basically it's telling you where to go for
17 each one of these things. The phone numbers are there
18 but you're going to have trouble getting through on
19 the phones. You're best bet is to get through on the
20 e-mails. That's what we put them for. Please use
21 them.

22 For general assistance, the e-mail is
23 ewrhelph@nhtsa. If it's a legal issue, that would be a
24 call to Chief Counsels. E-mails, if you're going to
25 submit any EWR information or a coversheet or the

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1 field reports, they would be coming in to
2 odi.ewr@nhtsa.gov. That's in the regulations. So is
3 the external communications. That's tsb@nhtsa.

4 The foreign recalls is in the regulation
5 but it has it as foreign_recalls and that should be
6 frecalls. And any assistance if you want to go over
7 SFTP and file transfer and the electronic protocols
8 and the like, the best bet is to go to the Artemis
9 Helpdesk. They can help you out with that. That
10 should just about do it and it does. Any questions?

11 CHAIRMAN WEINSTEIN: Before any questions,
12 I want to make two clarifications most of which I was
13 talking about. Certainly everything about the
14 aggregate data applies only to manufacturers that
15 produce more than 500 of a given category. One thing
16 about that 500 is what we mean that to be is 500
17 annually. If in good faith, you don't wait until you
18 get to 500 before you report.

19 In other words if in the first quarter,
20 you've made 400 buses let's say and you fully expect
21 to be over 500 by the end of the year, we want
22 reporting for that quarter. You don't just start
23 reporting in the second or third quarter when you
24 reach the 500 threshold. The other point on that if
25 you're over 500 in any year then you have to keep

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1 reporting the next two years even if you've gone down
2 to 400 or 300 the next year. That's in the
3 Regulation.

4 I think this is true, Jon. Correct me if
5 I'm wrong. The other thing is with folks who are
6 under that threshold who will be under 500 per year.
7 Of course all they have to do is report deaths. If
8 they don't have any deaths, they don't need to report
9 and they don't even need to call and get a EWR ID and
10 a manufacturer ID until they have to report actually.

11 So as somebody said the other day during
12 the equipment if somebody calls up and says "Please
13 give me an EWR ID" it's a good bet that they're going
14 to have to report a fatality for that quarter. But
15 you don't need to keep reporting if you just don't
16 have anything to report. You don't even have to get a
17 name.

18 MR. WHITE: Yes. That's part of the EWR
19 user account application to distinguish those that are
20 below threshold or equipment. We're not going to
21 issue them an ID unless they really have a death
22 incident to report. Again if they don't have one in
23 the succeeding quarters, then don't report back. We
24 don't want a bunch of zeros in the spreadsheet. Any
25 questions?

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1 MR. MANN: This is Kim Mann from National
2 Association of Trailer Manufacturers. Just out of
3 interest, is this handout available on the website
4 anywhere or will it be?

5 MR. WHITE: It will be.

6 MR. MANN: .pdf format.

7 MR. WHITE: Yes.

8 MR. MANN: Can a manufacturer still get
9 his manufacturer's ID number verbally through a
10 telephone contact or is it going to be available
11 solely through the web?

12 MR. WHITE: You have to go to the Internet
13 to get it. You'll get a temporary one through us and
14 that will be in hard copy. Then they can go to the
15 Internet to update their password and establish their
16 own.

17 MR. MANN: But the initial manufacturer's
18 ID number is available either by telephone to ODI or
19 by the Internet or only through the Internet.

20 MR. WHITE: Only through the Internet.
21 We'll give it to them in hard copy. That's the
22 official contact from us to them on consignment. Then
23 they can upgrade to their new password through the
24 Internet only.

25 CHAIRMAN WEINSTEIN: As I understand it,

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1 Jon, maybe we're talking about two different things.
2 Part of the reason we want it on the Internet is
3 because we need information about the history, what
4 type of manufacturer it is, how long they've been in
5 business, that sort of thing, which you'd be filling
6 out the form on the Internet.

7 MR. MANN: I thought maybe somebody would
8 go through asking the questions to the person who made
9 a call in but that doesn't make sense though.

10 CHAIRMAN WEINSTEIN: It could be done but
11 there's too much opportunity for error that way.

12 MR. MANN: Lastly, in the chart that shows
13 the various due dates under Death/Injury Report, it
14 states that the due date is 30 days of the end of the
15 reporting quarter and following submission of the EWR
16 data. What does that latter phrase mean "and
17 following submission of the EWR data"?

18 MR. WHITE: What that means is if you're a
19 manufacturer and you're submitting and you have all
20 this stuff to provide but you don't have any death and
21 injury to report, you can't submit that into the very
22 first day of the period and not put your production
23 and warranty and property damage claims in. The
24 production that's our master. We're using that to
25 validate against. That has to be in first before

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1 we'll accept the D&I report. That's what that means.

2 MR. MANN: Thanks.

3 CHAIRMAN WEINSTEIN: These are for people
4 over threshold by the way.

5 MR. WHITE: Yes.

6 CHAIRMAN WEINSTEIN: It doesn't apply to
7 the under 500.

8 MR. MANN: Thanks very much.

9 MR. MURPHY: Paul Murphy with Motor Coach
10 Industries ("MCI"). A couple of questions. The
11 first one on the first template in the first or second
12 column where you talked about the manufacturer
13 identifying itself. You said it could be any number
14 of characters. Would it not be reasonable to use our
15 WMI because that is exclusively identified to the
16 manufacturer and it's already identified through SAE
17 as to who we are as opposed to putting Motor Coach
18 Industries blah, blah, blah or MCI? I would that the
19 WMI would be the simplest.

20 CHAIRMAN WEINSTEIN: As Jon said, that's
21 up to the manufacturer. You can put your WMI. I
22 think some manufacturers have more than one WMI and so
23 they might be reluctant.

24 MR. MURPHY: We do depending on the
25 company and whether it's Canadian or U.S., etc. I'm

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1 just thinking from your perspective of tracking you
2 already have a listing of who the manufacturers are
3 and their WMIs.

4 MR. WHITE: Conceivably when you're
5 reporting in, you tell us on your account form that
6 this is who it's going to be. It could be a different
7 combination and different name for each. We're
8 Company A and we're going to report for this reporting
9 category and this reporting category for this product
10 and this product but our other product line somebody
11 else is going to report that. Whether or not it
12 transcends the WMI, that's up to the manufacturer.
13 But whatever they tell us in that user account, that's
14 what we're going to be using from thereon in.

15 MR. MURPHY: The next question deals with
16 the death and injury criteria. I know to an extent
17 we're dealing with nine model years back. What about
18 situations where vehicles that are older but we still
19 end up getting this type of information in that are
20 1970s, 1980s and they are still in commercial use. Do
21 we clearly knock that out and put it aside and not
22 include it?

23 MR. WHITE: That's right. Don't report
24 it.

25 CHAIRMAN WEINSTEIN: Unless we ask you for

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1 it in a follow-up. It's conceivable if we open an
2 investigation we're not telling you to throw the data
3 away. We're just saying that it does not have to be
4 reported on a quarterly basis.

5 MR. WHITE: It's not part of EWR. It's
6 outside the scope of early warning. It still might be
7 part of an investigation but not early warning.

8 MR. MURPHY: Okay. What about models or
9 product that may have been built within that nine
10 years that no longer exists or is no longer produced
11 and so on? Are we supposed to including that as part
12 of our data as well?

13 MR. WHITE: If it's a products that you
14 still are responsible for, yes. If it's coming in and
15 you're getting death incidence or you have warranty
16 for those even though you're not producing them, then
17 you'd be reporting on it. But if it's products that
18 you're not responsible for, then no, there's no
19 reporting of it.

20 CHAIRMAN WEINSTEIN: I think that might be
21 too confusing. If you stop making it ?- For example,
22 since this is not the light vehicles, if Toyota
23 stopped making Camrys next year, they would still have
24 to report about fatalities in Camrys for the next
25 eight or nine years for vehicles that were less than

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1 nine years old at the time of the report.

2 In other words, the fact that there is no
3 longer any Camrys being made, it doesn't stop the duty
4 to report. Once the vehicle is over ten years old,
5 then you don't have to report it. I shouldn't say the
6 vehicles is over ten years old. That's not the right
7 way. If the model year of the vehicle is more than 10
8 years old, then it's outside of early warning
9 reporting.

10 MR. MURPHY: Okay. Thank you.

11 MR. WHITE: Any other questions?

12 MR. SCHAEFER: My name is Will Schaefer
13 with the Truck Manufacturers Association. You
14 mentioned some changes to the templates. Was it
15 correct that version 1.2 or newer is what's used?

16 MR. WHITE: The only distinct difference
17 is going to be that sequence ID. The rest of it for
18 vehicles hasn't changed.

19 MR. SCHAEFER: Okay. Thanks.

20 CHAIRMAN WEINSTEIN: And we'll try to
21 minimize any changes in the future. Right, Jon?

22 MR. WHITE: Yes. Well that's not correct.
23 We did change the type. We did put type in that. We
24 did that but I think that was already incorporated in
25 there.

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1 CHAIRMAN WEINSTEIN: Were you able to
2 confirm earlier, Jon, about the question that was
3 asked this morning about should they all be in all
4 upper case or did we not pin that down yet?

5 MR. WHITE: I haven't gotten confirmation
6 on that yet. I believe it is. We don't have that
7 yet.

8 MR. SELANDER: Steve Selander from Warner
9 Norcross & Judd. In field reports, you have something
10 that's called "Application" that says "single models,
11 single platform, multiple models", etc. Is NHTSA
12 assuming that probably 99 percent of the reports are
13 going to be single vehicle and so single model? Or is
14 there some kind of definitions for these things that
15 we're not aware of yet?

16 MR. WHITE: No, it's pretty much straight
17 forward. A field report is up to the manufacturer.
18 We don't control how they design their field reports
19 and what they put on it. It's all discretionary.
20 It's only distinction there is if it's a single model,
21 we'd want that code. If it's going to affect more
22 than one model - it might be two different particular
23 models - then that would be a multiple model. That's
24 the only point for that.

25 MR. SELANDER: But a field report is

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1 defined to be an individual vehicle being involved.

2 CHAIRMAN WEINSTEIN: No.

3 MR. WHITE: I don't recall that.

4 MR. SELANDER: Well it's in. It certainly
5 could be an individual customer with multiple vehicles
6 but most of the field reports are going to be an
7 individual vehicle involved and the field report
8 generally doesn't say how many model years that
9 vehicle was produced or anything along those lines.
10 I'm assuming at least as I look at this that 99
11 percent of this is going to be single vehicle, single
12 model, etc.

13 MR. WHITE: But you can go to a fleet and
14 he has a mix of product and you're going to report on
15 the product what you found out there.

16 MR. SELANDER: And that is a possibility
17 and that gets a second question. If there's a fleet
18 and several models or model years are mentioned in a
19 field report, I'm assuming if the mention of the
20 earlier model years or some of the model years are it
21 didn't have a problem then but it started in such and
22 such that you are not interested in models being be
23 delineated or you have the model year that are said to
24 not have the problem.

25 MR. WHITE: No, ideally we'd say that but

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1 we're not going to require the manufacturers to do
2 that and make that judgment call. We're not going to
3 try to trace that down. If it's within the scope of
4 that field report and that's how it gets reported to
5 us from the manufacturer then when we go through that
6 field report we expect those models to be addressed.

7 If he chooses not to do that because he's
8 substantively found that it's only this, then in there
9 he's mentioned that we'd looked at these other ones
10 and they are not part of it. That's fine. He only
11 has to identify the ones. That's what we really want.

12 We're not going to make him do only that. We're
13 trying to keep this as easy as possible.

14 CHAIRMAN WEINSTEIN: Steve. Jon, correct
15 me if I'm wrong. I think there's another type of
16 field report where a manufacturer might go out and
17 send an engineer out and then the report would get
18 written and say "This report applies to model year
19 1999 through 2001 Buick Centuries, Oldsmobiles"
20 whatever the same platform is and whatever.

21 Then it would be multiple models even
22 though maybe the first place they went was a single
23 vehicle. In other words, the report could deal with a
24 platform. I think you're 99 percent is high. It
25 might be the majority but I'm expecting that a number

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1 of field reports might not be limited to a particular
2 vehicle as written up. It depends on the
3 manufacturer. As Jon said, it's how the manufacturer
4 sets up its field report system. We're not going to
5 impose our will on that.

6 MR. WHITE: The definitions of field
7 reports have changed both for the manufacturers and
8 for us and how they're being used and how they do
9 field reports. That's what's part of driving it.

10 MR. SELANDER: Okay. A separate question
11 on versions and updating. Once we have a system
12 identified where we previously had a 99, that's an
13 update and that becomes a new version. You said this
14 morning and I don't know whether it was said this
15 afternoon that you expect people to do that updating
16 as the information becomes available as opposed to
17 waiting for the next quarter.

18 MR. WHITE: Right.

19 MR. SELANDER: Doesn't that mean that you
20 are going to be getting inundated with requests to
21 update based on things that are required to be updated
22 in the Rule?

23 MR. WHITE: Possibly. We expect that by
24 the end of the quarter the manufacturer in good faith
25 has ascertained the VIN or one or more of the

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1 components that most of the allegations of death will
2 claim that he's getting because it has to be a claim
3 of death on his product. Some allegation must include
4 what the component was. That remains to be seen. We
5 may also find in that context that maybe nine is not
6 going to work because we might have more than that.
7 That's why that versioning is actually three
8 characters now but a working model is nine.

9 MR. SELANDER: That may be too small for
10 some of the larger manufacturers. Thank you.

11 CHAIRMAN WEINSTEIN: Three characters and
12 999 events, it's hard to see that there would be more
13 than 999 updates of a given quarterly since all that
14 has to be updated is when you get a VIN that wasn't
15 there originally or when you get a component when none
16 was there originally. If it is the case, we'll add
17 another digit but I would hope that we're not going to
18 get deluged.

19 MS. GRANT: Marianne Grant, Syncata. A
20 couple of questions. One is about hard-copy field
21 reports that you mentioned twice this morning. Do you
22 really mean that you are going to take hard-copy field
23 reports? I know in the past it's been said and
24 there's been a comment made that possibly you don't
25 really want them. You really want them

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1 electronically. I know that for many manufacturers
2 the whole field report is a big deal and if they could
3 send you paper, they probably would.

4 MR. WHITE: We'll accept paper but again
5 they have to have each file that has that file name
6 with it even if it's in hard copy. You have to have
7 that with it and identified on each one. There is no
8 way to stop it. It's part of the Regulation. If we
9 can accept hard copies, we will.

10 CHAIRMAN WEINSTEIN: If we see that if in
11 the off chance some manufacturers try to abuse the
12 process and unduly burden us, we of course can change
13 that Regulation but for the moment that was put really
14 for small manufacturers that have not digitized their
15 field reports and only have a few each reporting
16 quarter as a convenience to them.

17 MS. GRANT: And the second question
18 regarding field reports, this morning the gentleman
19 asked about .html. He said he had a written
20 communication for Volpe that I think came out of the
21 testing cycle that said that .html is fine. So is
22 there anything else that might in those written
23 communications that other people don't know about?

24 MR. WHITE: No. I thought those meeting
25 notes were put on the web in a docket.

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1 MS. GRANT: I said out of the testing, not
2 out of the meeting.

3 MR. WHITE: Right. But I think they were
4 put on the docket. They should be there. Whatever we
5 said there it wouldn't matter anyway in this context.
6 The .html in this stage is not accepted version.
7 This is what we're dealing with from Volpe. This is
8 what they told us they can accept. It's this and this
9 and this. Now somewhere along the line, we said .html
10 was going to be acceptable, I'll have to investigate
11 that and get that clarified. I think we can do that
12 but right now we're not. I've sent up a contact to
13 them today to find out about that and they haven't
14 responded on that.

15 Anything else that was worked out there
16 that was a working give-and-take to try to resolve
17 issues up front. So anything that came out of there
18 if we're going to incorporate it, it will be in the
19 compendium. It's in the Regulation. As you've seen,
20 we've made changes in Notice 5 to accommodate that.
21 Some of those things that we were doing up there don't
22 exist anymore. Any other questions?

23 CHAIRMAN WEINSTEIN: Thank you very much.
24 There will be a transcript made of this as with the
25 other meetings earlier today and yesterday and they'll

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1 be put in our docket and probably on the web as well.

2 MR. WHITE: They'll be part of the
3 compendium.

4 CHAIRMAN WEINSTEIN: Off the record.

5 (Whereupon, the above-entitled matter was
6 concluded at 2:07 p.m.)

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